

HONDA

American Honda Motor Co., Inc.
1919 Torrance Boulevard
Torrance, CA 90501-2746
Phone (310) 783-2000

June 29, 2006

NHTSA
WASHINGTON, DC
2006 JUN 30 F 11:11

OFFICE OF
COUNSEL

Mr. Otto Matheke
Office of the Chief Counsel
NATIONAL HIGHWAY TRAFFIC SAFETY
ADMINISTRATION
400 Seventh St., S.W.
Washington, DC 20590

**Re: NVS-213DLR/PE05-050
2003-2005 MY Honda Pilot and Acura MDX fuel tank puncture inquiry**

Dear Mr. Matheke:

Enclosed herewith is the response of American Honda to your denial of our request for confidential treatment of certain materials included in the above referenced matter. Thank you for your explanation of the need for further explanation of the nature of the confidential materials, and the harm that would be caused to Honda if this information were not treated confidentially. Honda would like to resubmit a request for confidentiality. We have provided additional justification for your consideration.

Our request for confidentiality relates to portions of the information we are submitting to NHTSA that includes details about our in-house design criteria and test procedures. Both the design criteria and test procedures have been specifically developed by our engineers, and are independent of regulations and industry standards. Releasing these design criteria and test procedures would allow our competitors to follow the proprietary guidelines that we have established to achieve our targets for safety, durability, quality and reliability. We consider our unique approach to these issues a core competitive advantage.

We believe these details may help NHTSA's overall understanding of the occurrences under study at this time, but respectfully ask that confidentiality be maintained for the portions of these materials that we consider sensitive. The development and evolution of these criteria and procedures has required a considerable investment of human and capital resources by Honda. Making this proprietary information available to our competitors would put us at a competitive disadvantage as a result of voluntarily responding to an NHTSA peer review inquiry.

I hope that this explanation is sufficient for your needs. It would be difficult to explain our concerns in any more detail without releasing the very information we are seeking to keep confidential.

The confidential material contained on pages 5, 19, 27, 28, 29, and 31 was submitted to your office on May 8 and has not changed; therefore it will not be submitted again with this request.

Please advise me of your decision on this matter at your earliest convenience.

Very truly yours,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen
Managing Counsel
Product Regulatory Office

WRW:nis

cc: Jeffrey Quandt