

DEC 29 2009

James P. Vondale  
Ford Motor Company  
Fairlane Plaza South  
330 Town Center Drive  
Dearborn, MI 48126

Re: Petition for Reconsideration / Confidentiality Request in EA06-020

Dear Mr. Vondale:

This responds to your April 13, 2009, letter requesting partial reconsideration of Mr. Otto Matheke's March 16, 2009, partial denial of a Ford Motor Company (Ford) request for confidential treatment. Ford's original request, dated July 9, 2008, sought confidential treatment for information submitted to the National Highway Traffic Safety Administration in response to an agency Information Request in the above investigation.

The agency's March 16, 2009, letter denied confidential treatment for marked pages EA06-020 1459-1472 that were submitted in Spanish without English translations. Your reconsideration request, which now includes English translations for these pages, states that the documents are maintained under a record keeping system that is intended to control dissemination of this material within Ford, and to assure that the material is not disseminated outside of Ford. You contend that the documents are not customarily released to the public and contain confidential business information, the disclosure of which would likely cause substantial competitive harm. Ford requests confidential treatment for ten years for these pages and does not otherwise seek reconsideration of the March 16, 2009, partial denial.

I am granting your request.

Because Ford has now provided a translation of the documents at issue, I turn to the merits of your request. Examination of this material indicates that the materials for which you request confidentiality are entitled to confidential treatment pursuant to Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4). Therefore, I am granting your request for confidential treatment.

This grant of confidential treatment is subject to certain conditions. The information may be disclosed under 49 CFR § 512.22 based upon newly discovered or changed facts, and you must inform the agency of any changed circumstances that may affect the protection of the information. 49 CFR § 512.10. If necessary, you will be notified prior to the release of any information under the procedures established by our regulations. 49 CFR § 512.22(b).

Sincerely yours,

**Original Signed By**

O. Kevin Vincent  
Chief Counsel

