

NKS-213
A. Noel

James P. Vondale
Director, Automotive Safety Office
Environmental & Safety Engineering
Ford Motor Company
Fairlane Plaza South, Suite 500
330 Town Center Drive
Dearborn, MI 48126-2738

OCT 27

Re: Request for Confidential Treatment for Information/PE06-030

Dear Mr. Vondale:

This responds to your September 29, 2006, letter requesting confidential treatment for information submitted by Ford Motor Company (Ford) in response to the above agency information request. Ford identifies this information as the "Appendix". Ford requests confidential treatment for a period of ten (10) years.

Ford contends this document contains confidential business information relating to investigational and remedial processes used by Ford and its suppliers to resolve safety concerns. Ford does not make this information publicly available, and its disclosure would be likely to cause Ford substantial competitive harm.

I have decided to grant your request.

Because this information was not submitted voluntarily, I have reviewed your submission under the competitive harm standard announced in *National Parks & Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974) and its progeny. Under that test, information is confidential under Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4), if its disclosure would be likely to cause substantial competitive harm to the submitter or to impair the government's ability to collect the information in the future.

The information concerning the internal process by which Ford and its suppliers study and resolve safety issues is commercially sensitive and could be used by Ford's competitors to improve their own products and processes without the need to invest the substantial resources invested by Ford. Release of this information would be likely to cause Ford to suffer competitive harm.

Subject to the conditions below, this grant of confidential treatment will remain in effect for ten (10) years.

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,
Original Signed By

Otto G. Matheke, III
Senior Attorney

NHTSA:NCC-111(Transtecs)jj:10/24/06
NCC-113 Subj/Chron, jj, om, cyt **NCC06-006345**
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