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OFFICE OF CHIEF (S) MAR 20 A.

March 13, 2007

Mr. Anthony M. Cooke Chief Counsel Office of Chief Counsel Room 5219 National Highway Traffic Safety Administration 400 Seventh Street, S.W. Washington, D.C. 20590

Dear Mr. Cooke:

Subject: Request Under 49 CFR Part 512 for Confidential Treatment of Information

Two copies of confidential information referenced in the Mazda Motor Company (Mazda) March 13, 2007, letter to Mr. Jeffrey L. Quandt relating to the agency's December 20, 2006 inquiry, EA06-010, are attached. Also attached for your reference is a copy of Mazda's March 13, 2007, letter in response to the ODI's information request.

This letter provides support for Mazda's claim of confidentiality in accordance with 49 CFR Part 512.8. Mazda requests confidential treatment for the documents included in Appendix 7d/7e because the document is not customarily released to the public by Mazda and because the document contains confidential business information, the disclosure of which would likely cause substantial competitive harm to Mazda (as contemplated in 49 CFR § 512.15, 5 and U.S.C. § 552(b)(4)).

Mazda documents of these types are not disseminated outside of Mazda, except as described in the attached certification, which is made pursuant to 49 CFR Part 512.4(b). Neither NHTSA nor other Federal agencies have made determinations relating to the confidentiality of the submitted information or similar information, to the best of Mazda's knowledge.

The documents contain commercial information and are exempt from disclosure pursuant to 49 CFR § 512.15, 5 U.S.C. § 552(b)(4). The pages of the documents for which Mazda requests confidential treatment are labeled "ENTIRE PAGE CONFIDENTIAL".

Mazda requests that these documents be granted confidential treatment by the agency for a period of ten years. Earlier disclosure of the documents, in Mazda's opinion, would result in substantial competitive harm.

In the event that the agency should conclude that all or part of the submitted information is not to be given confidential treatment, Mazda asks the agency to provide reasonable notice of not less than ten working days prior to any contemplated disclosure in order that Mazda may pursue such legal remedies as it may choose.

If you have any questions regarding the enclosed final response, please let me know. My telephone number is (313) 594-7778 and my e-mail address is drobertson@mazdausa.com.

Sincerely,

David Robertson, Group Manager Environmental, Safety and Powertrain

Engineering

Attachment

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

- I, D. G. Robertson, pursuant to the provisions of 49 CFR 512, state as follows:
- I am Group Manager, Environmental and Safety Engineering department, and I am authorized by Mazda Motor Company to execute this certificate on its behalf;
- 2. The information contained in the Request Under 49 CFR Part 512 for Confidential Treatment of Information dated March 13, 2007 is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4);
- A member of my staff has personally inquired of the responsible Mazda Motor Company personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Mazda Motor Company;
- 4. Based upon such inquiries, to the best of my knowledge, information and belief, the information for which Mazda Motor Company has claimed confidential treatment has never been released or become available outside Mazda Motor Company except as hereinafter specified:
 - Portions of this document or the confidential information may have been or may be shared with Mazda suppliers with the expectation that they will be kept confidential.
 - During the course of defending itself in litigation, Mazda may have been, or may be required to produce such information.
- I make no representation beyond those contained in this certificate and in particular, I
 make no representations as to whether this information may become available outside
 Mazda Motor Company because of unauthorized or inadvertent disclosure; and
- I certify under penalty of perjury that the foregoing is true and correct. Executed on this 13th day of March 2007.

D. G. Robertson