

GM-688 Supplement 1
PE06-016

GM CONFIDENTIALITY LETTER

December 22, 2006

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

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GM-688 Supplement 1

NVS-213dlr
PE06-016

Dear Mr. Cooke:

Pursuant to a request made by Jeff Quandt on December 20, 2006, please find enclosed with this letter two copies of General Motors' (GM) summary of the results of its analysis of the field incidents for the subject investigation.

GM requests that the document stamped "GM Confidential" included in Attachment 1 CD GM Confidential be afforded confidential treatment without a time limitation by NHTSA. This information is not customarily made public by General Motors and contains trade secrets and commercial information which is privileged or confidential under 5 U.S.C. Section 552(b)(4), 49 CFR Part 512 and 49 U.S.C. Section 30167(a).

The following identifies the specific type of confidential information contained in the document:

Document Name	Information types
Summary of Weibull Analysis Supplement 1	GM's application of engineering judgment and analysis methodologies.

GM requests confidential treatment of the information in these documents because it includes trade secrets and the disclosure of which would cause substantial competitive harm. GM submits that the competitive harm would be substantial because the design and manufacture of vehicles and vehicle components are the core of its business and because global competition in that business is intense.

The document labeled "Summary of Weibull Analysis Supplement 1" on the Attachment 1 CD GM CONFIDENTIAL identified above discloses information about GM's application engineering business process for engineering judgment, analysis methodologies, and action. This information would give competitors insight into GM's methodologies and disclose confidential information about the design and performance of its products, without spending their own resources compensating GM for the knowledge they would gain.

GM treats the above material as confidential proprietary information available only to authorized GM, supplier, and customer personnel who have a business need for them, and are not otherwise available to the public. These documents are maintained under a record-keeping system that is intended to control dissemination of this material within GM and supplier and customer personnel, and to assure that it is not freely disseminated outside the Corporation. Multiple security systems are used to limit access to facilities and record storage systems where confidential information is stored and employees receive training in information security policies and procedures.

Product Investigations

Mail Code: 480-210-G11 • 30001 Van Dyke • Warren, MI 48090
GM688 Response Supplement 1 Confidentiality Request



To the best of our knowledge, the NHTSA, other Federal Agencies, or the Federal Courts has made no prior determinations of the confidentiality for these documents. These types of documents, however, have normally been granted confidential treatment by the NHTSA in the past, to the best of our knowledge.

The documents subject to this request for confidentiality are being provided and have been clearly stamped "GM CONFIDENTIAL" on a CD label. If a request for disclosure of any or all of this information is received by the NHTSA, General Motors requests notification of receipt of each such request and, if necessary, an opportunity to further explain the reasons why such material is trade secret and commercial information which should not be disclosed under the applicable statutes and regulations.

If you require further information about this request, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "G. P. Kent", with a long horizontal flourish extending to the right.

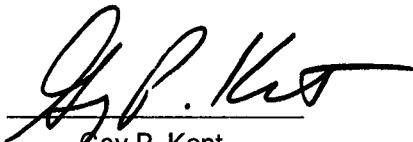
Gay P. Kent
Director
Product Investigations

Attachment

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, Gay P. Kent, pursuant to the provisions of 49 CFR Part 512, state as follows:

- (1) I am Director of Product Investigations of General Motors Corporation and am authorized to execute this certificate on its behalf.
- (2) I certify that the information contained in the documents identified in the letter dated December 22, 2006 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) and 49 C.F.R. Part 512.
- (3) I hereby request that the information be protected without a time limitation.
- (4) This certification is based on the information provided by the responsible GM personnel who have responsibility for the documents being provided to NHTSA for which a claim of confidentiality has been made.
- (5) Based on that information, to the best of my knowledge, information and belief, the information for which GM has claimed confidential treatment has never been released or made available outside GM and supplier or customer personnel.
- (6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside GM because of unauthorized or inadvertent disclosure.
- (7) I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 22nd day of December 2006.



Gay P. Kent
Director
Product Investigations

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ATTACHMENT "1"
GM CONFIDENTIAL MATERIAL