

Stephan J. Speth, Director  
Chrysler LLC  
800 Chrysler Drive  
CIMS 482-00-91  
Auburn Hills, MI 48326-2757

MAR 13 2008

Re: Request for Confidential Treatment for Information Provided in EA07-007

Dear Mr. Speth:

This responds to your January 4, 2008, request for confidential treatment for Chrysler LLC ("Chrysler") information given in response to an agency information request regarding engine stalling issues in MY 2006-2007 Jeep Commanders. The information for which you request confidential information is contained on a January 4, 2008 CD-ROM entitled "EA07-007 Chrysler Confidential Business Information." Two Chrysler suppliers, Lear Corporation (Lear) and Continental Automotive Systems US, Inc. (formerly known as Siemens VDO Automotive Corporation) (Continental) have provided certifications outlining their view that the materials included in Chrysler's submission are confidential. These certifications are incorporated into your request. Chrysler seeks permanent confidential treatment.

Your request is granted.

I reviewed Chrysler's claim for confidential treatment under the test applied 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.

You contend that the confidential material in Enclosures 8, 9, 10, 11 and 15 consists of documents showing design failure mode effects and analysis, individual problem solving evaluations, design illustration showing process change, performance standards and confidential emails and attachments between Chrysler and its suppliers. Chrysler claims this information would allow competitors to determine design and operational procedure specifics that could be used to assist competitors in improving their own systems to more effectively compete with Chrysler without incurring the costs normally associated with developing such procedures.

I concur with Chrysler's assertion that the information contained in the documents would be likely to cause it substantial competitive harm if released.

This grant of confidential treatment will remain in effect permanently. The information may be disclosed under 49 C.F.R. § 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 C.F.R. § 512.10). If necessary, you will be notified prior to the release of any information under procedures established by our regulations (49 C.F.R. § 512.22(b)).

Sincerely,

**Original Signed By**

Otto G. Matheke, III  
Senior Attorney

