

January 4, 2008

Mr. Anthony M. Cooke Office of Chief Counsel (NCC-111) National Highway Traffic Safety Administration 1200 New Jersey Ave., SE, Room W41-227 Washington, DC 20590



Re:

Request for Confidential Treatment of Business Information Submitted in EA07-

007

Dear Mr. Cooke:

Chrysler LLC ("Chrysler") is submitting information on CDs to the NHTSA Office of Defects Investigation in connection with the above referenced Information Request ("IR"). Based on a careful review of the submission, Chrysler has determined that the files in Enclosure 8, 9, 10, 11 and 15 - Confidential Business Information should be accorded confidential treatment under this agency's regulations and 49 C.F.R. Part 512 and Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4). Therefore, Chrysler is submitting these CDs together with this request for confidential treatment to the Office of Chief Counsel.

As required by Part 512, Chrysler is submitting certificates executed by responsible Chrysler, Siemens VDO, and Lear Corporation personnel. The information required by Part 512 is set forth below.

A. Description of the Information (49 C.F.R. § 512.8(a))

The business information for which confidential treatment is being sought in Enclosure 8 Confidential Business Information consists of one Excel spreadsheet of the meeting minutes of the multi-disciplinary task force with the analysis and problem solving agenda for the test fleet vehicles and sixteen Excel spreadsheet individual problem solving evaluations of the test fleet of vehicles (no Bates pg. #), and four Failure Mode and Effects Analysis documents. (Bates page #EA07-007-Chrysler-0001-0047). Enclosure 9 Confidential Business Information contains an Excel spreadsheet change history (no

¹ Chrysler has taken steps to assure that the CDs are free of any errors or defects that would prevent NHTSA from opening each file on the disc. If, however, the agency is unable to open any of the files, Chrysler respectfully requests that the agency inform Chrysler of the issue, so that Chrysler may take steps to supply NHTSA's Office of Chief Counsel with a disc that is fully functional.

Bates pg. #) and two change notice documents. (Bates page #EA07-007-Chrysler-0048-0050). Enclosure 10 Confidential Business Information has four performance standards for the subject components and engine. (Bates page #EA07-007-Chrysler-0051-0342). Enclosure 11 Confidential Business Information contains the confidential emails and attachments between Chrysler and its suppliers on this issue. These documents contain problem solving techniques and analysis as well as some testing data. (Bates page #EA07-007-Chrysler-0343-0605). Enclosure 15 Confidential Business Information contains two testing documents. (Bates page #EA07-007-Chrysler-0606-0607).

The table attached to this letter will more fully describe the documents.

B. Confidentiality Standard (49 C.F.R. § 512.8(b))

This submission is subject to the substantial competitive harm standard set forth in 49 C.F.R. § 512.15(b) for information that a submitter is required to provide to the agency.

C. Justification for Confidential Treatment (49 C.F.R. § 512.8(c))

This agency's regulations and Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4), protect the confidentiality of information that would be likely to cause substantial competitive harm to the submitter if disclosed. See, e.g. 49 C.F.R. § 512.15(b); Nat'l Parks & Conservation Ass'n v. Morton, 498 F.2d 765, 770 (D.C. Cir. 1974). FOIA Exemption 4 was enacted to prevent disclosures that would "eliminate much of the time and effort that would otherwise be required to bring to market a product competitive with the [submitter's] product." Public Citizen Health Research Grp. v. FDA, 185 F.3d 898, 905 (D.C. Cir. 1999). "Because competition in business turns on the relative costs and opportunities faced by members of the same industry, there is a potential windfall for competitors to whom valuable information is released under FOIA. If those competitors are charged only minimal FOIA retrieval costs for the information, rather than the considerable costs of private reproduction, they may be getting quite a bargain. Such bargains could easily have competitive consequences not contemplated as part of FOIA's principle aim of promoting openness in government." Worthington Compressors, Inv. v. Costle, 662 F.2d 45, 51 (D.C. Cir. 1981). Among the competitively significant disclosures that FOIA Exemption 4 was enacted to prevent were disclosures that would reveal a firm's "operational strengths and weaknesses" to competitors. See National Parks & Conservation Ass'n v. Kleppe, 547 F.2d 673, 684 (D.C. Cir. 1976). The information at issue here should be protected under these standards.²

The failure mode effects and analysis documents would cause substantial competitive harm if disclosed because these documents set forth provisional assessments of potential risks associated with various failure modes. This information sets forth Chrysler's internal performance standards and data analyses. Competitors could determine the type

² As noted above, Chrysler is providing a table that identifies the confidential information on the enclosed discs, and specifies the location of the information (by enclosure number and, where applicable, by folder and sub-folder as well as the Bates page numbers). The table also briefly states the basis for the confidentiality claims.

of analyses that Chrysler does and compete more effectively without spending the time and resources to develop their own analyses.

The change notices and history reveal information about the design and manufacturing process changes to the subject component, the timing of such changes, the reasons for the changes, and the process by which such changes were made. Thus, these documents reveal information about designs and design manufacturing processes, as well as Chrysler lead time and operation capacity information. Disclosure of this information could enable Chrysler's competitors to improve their own designs and manufacturing processes, and compete more effectively against Chrysler.

The performance standards in this submission could enable a competitor to develop, upgrade, and improve its design decisions, and gain insights into Chrysler's operational capacities. Disclosure of these performance standards would cause substantial competitive harm to Chrysler because competitors could use this information without incurring the costs normally required for independent development of such standards and procedures.

Competitors could determine how Chrysler and its suppliers, Siemens VDO Automotive Corporation (now know as Continental Automotive Systems US, Inc.) and Lear Corporation use their capabilities to investigate and analyze issues with the problem solving documents and meeting minutes document. They could use this information to improve their own problem solving capabilities and save the considerable time and money that Chrysler, Siemens VDO and Lear have spent in developing these procedures. This would enable these competitors to compete more effectively with Chrysler, Siemens VDO and Lear. The release of these documents would give competitors an unfair advantage over Chrysler. This is the type of unfair advantage that Exemption 4 was enacted to protect against. (Chrysler is submitting herewith a Certificate in Support of Request for Confidentiality from Siemens VDO and Lear with respect to the documents obtained from Siemens VDO and Lear.)

The multi-disciplinary task force used their expertise and spent a considerable amount of time to develop the evaluation forms that were used in this investigation. Competitors could use this information to improve their own problem solving and evaluation techniques without spending the time and using the technical expertise needed to develop these processes and techniques themselves and therefore compete more effectively against Chrysler.

The testing information contained in this submission shows how Chrysler evaluates its products. It reveals the process of analysis and product testing methodology. The disclosure of such information would enable competitors to refine their own product evaluation, develop and upgrade its own testing protocols, improve design decisions, and gain insights into Chrysler's operational capacities without incurring the costs normally required for independent development of such procedures.

D. Class Determination (49 C.F.R. § 512.8(d))

The information for which confidential treatment is sought does not fit within a class determination.

E. Duration for Which Confidential Treatment is Sought (49 C.F.R. § 512.8(e))

Because Chrysler anticipates that the information will be competitively sensitive indefinitely, Chrysler requests that the information be accorded confidential treatment permanently.

F. Contact Information (49 C.F.R. § 512.8(f))

Please direct all inquiries and responses to the undersigned at:
800 Chrysler Drive, CIMS 482-00-91
Auburn Hills, MI 48326
248-512-4188
SS6@chrysler.com

If you receive a request for disclosure of the information for which confidential treatment is being sought before you have completed your review of our request, Chrysler respectfully requests notification of the request(s) and an opportunity to provide further justification for the confidential treatment of this information, if warranted.

Sincerely,

Stephan J. Speth

cc: Kathleen DeMeter

Attachment and Enclosures

ATTACHMENT TO REQUEST FOR CONFIDENTIAL TREATMENT OF BUSINESS INFORMATION SUBMITTED IN CONNECTION WITH EA07-007 WITHIN ENCLOSURES – 8, 9, 10, 11, and 15 CONFIDENTIAL BUSINESS INFORMATION

QUESTION	ENCLOSURE	FILE/DOCUMENT	DOCUMENT	BATES	CONFIDENITALITY
#		NAME	DESCRIPTION	PAGE#	JUSTIFICATION
SOURCE					
8	Enclosure 8	NGC3A ETC	Failure mode	EA07-	Competitors could
	Confidential	DFMEA 3 rd Addition	analysis	007-	determine how
Chrysler	Business	020305.pdf	_	Chrysler-	Chrysler evaluates its
	Information	-		0038-	products and improve
				0046	their own evaluation
					system to compete
İ					more effectively
_					against Chrysler.
8	Enclosure 8	NGC3A Engine	Failure mode	EA07-	Competitors could
	Confidential	DFMEA 3 rd Addition	analysis	007-	determine how
Chrysler	Business	020305.pdf		Chrysler-	Chrysler evaluates its
	Information			0006-	products and improve
				0037	their own evaluation
					system to compete
	:				more effectively
					against Chrysler.
8	Enclosure 8	NGC3A LISTS	Failure mode	EA07-	Competitors could
	Confidential	DFMEA 3 rd Addition	analysis	007-	determine how
Chrysler	Business	020305.pdf		Chrysler-	Chrysler evaluates its
	Information			0047	products and improve
					their own evaluation
	,				system to compete
					more effectively
					against Chrysler.
8	Enclosure 8	Consolidated_FMEA_	Failure mode	EA07-	Competitors could
	Confidential	MOD.pdf	analysis	007-	determine how
Chrysler	Business			Chrysler-	Chrysler evaluates its
	Information			0001-	products and improve
				0005	their own evaluation
					system to compete
					more effectively
		7.5) D7/A	against Chrysler.
8	Enclosure 8	Meeting Minutes	Analysis and	N/A	Competitors could
	Confidential	0071011.xls	problem		determine how
Chrysler	Business		solving agenda		Chrysler evaluates its
	Information		for test fleet		products and improve
			vehicles		their own evaluation

QUESTION	ENCLOSURE	FILE/DOCUMENT	DOCUMENT	BATES	CONFIDENITALITY
#		NAME	DESCRIPTION	PAGE#	JUSTIFICATION
SOURCE	<u> </u>				
					system to compete
					more effectively
					against Chrysler.
8	Enclosure 8	16 separate Excel	16 Problem	N/A	Competitors could
	Confidential	spreadsheet	solving		determine how
Chrysler	Business	evaluation forms by	documents with		Chrysler evaluates its
	Information	VIN	the results of		products and improve
			the test fleet of		their own evaluation
			vehicles by the		system to compete
			multi-		more effectively
			disciplinary		against Chrysler.
			task force.		
9	Enclosure 9	06 07 WK XK IPM	Change history	N/A	Competitors could
	Confidential	Change History – Rev			determine the design
Chrysler	Business	2.xls			and manufacturing
	Information				processes and
					operational strengths
					of Chrysler and could
					improve their own
					processes to compete
1					more effectively
					against Chrysler.
9	Enclosure 9	51115-J07.pdf	Change notice	EA07-	Competitors could
	Confidential			007-	determine the design
Chrysler	Business			Chrysler-	and manufacturing
	Information			0048-	processes and
				0049	operational strengths
					of Chrysler and could
					improve their own
					processes to compete
					more effectively
0	F 1 0	700203700 16	C1	E407	against Chrysler.
9	Enclosure 9	70929V00.pdf	Change notice	EA07-	Competitors could
	Confidential			007-	determine the design
Chrysler	Business			Chrysler-	and manufacturing
	Information			0050	processes and
					operational strengths of Chrysler and could
					improve their own
					processes to compete more effectively
					against Chrysler.
10	Englosure 10	NGC3 A porfetd pdf	Engine	EA07-	Competitors could
10	Enclosure 10	NGC3A perf std.pdf	Engine	EAU/-	Compeniors could

	QUESTION	ENCLOSURE	FILE/DOCUMENT	DOCUMENT	BATES	CONFIDENITALITY
)	# SOURCE		NAME	DESCRIPTION	PAGE#	JUSTIFICATION
	Chrysler	Confidential Business Information		performance standard	007- Chrysler- 0051- 0160	determine the performance standards that Chrysler uses for its products and improve their own standards and compete more effectively against
	10 Chrysler	Enclosure 10 Confidential Business Information	NGC4 perf std.pdf	Engine and transmission performance standard	EA07- 007- Chrysler- 0161- 0268	Chrysler. Competitors could determine the performance standards that Chrysler uses for its products and improve their own standards and compete more effectively against Chrysler.
	10 Chrysler	Enclosure 10 Confidential Business Information	PF10656SE- MODULE-FRONT COMPARTMENT (FCM) WITH CAN BUS GATEWAY.pdf	Performance standard for the FCM	EA07- 007- Chrysler- 0269- 0313	Competitors could determine the performance standards that Chrysler uses for its products and improve their own standards and compete more effectively against Chrysler.
	10 Chrysler	Enclosure 10 Confidential Business Information	PF-10660- INTELLIGENT POWER MODULE.pdf	Performance standard for the IPM	EA07- 007- Chrysler- 0314- 0342	Competitors could determine the performance standards that Chrysler uses for its products and improve their own standards and compete more effectively against Chrysler.
	11 Chrysler	Enclosure 11 Confidential Business Information/	8-23-06/7 mil Solder Screen Forever Requirement Submission.pdf	Email with testing data	EA07- 007- Chrysler- 0560	Confidential on the grounds that the document sets forth testing information

	QUESTION #	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE#	CONFIDENITALITY JUSTIFICATION
1	SOURCE		TTMTL	· ·	1110137	3051H 102111011
		Emails				and competitors could determine the type of testing the Chrysler
						does in evaluating its products and use the
l						information to
ļ						improve their own
			,			testing and compete
1						more effectively against Chrysler.
ŀ	11	Enclosure 11	8-23-06/Forever	Email	EA07-	Competitors could
	11	Confidential	Requirement for	attachment –	007-	determine the design
	Chrysler	Business	Solder Bump and 7	process change	Chrysler-	and manufacturing
	Ciliyalei	Information/	mil Screen.pdf	notification	0561-	processes and
İ		Emails	·		0562	operational strengths
						of Chrysler and could
						improve their own
i	:					processes to compete
1	!					more effectively
						against Chrysler.
ì	11	Enclosure 11	8-23-06/6 mil BOB1-	Photo of test	N/A	Confidential on the
	CI I	Confidential	10807-54.jpg	set-up		grounds that the document sets forth
İ	Chrysler	Business Information/				testing information
-		Emails				and competitors could
		Emans				determine the type of
						testing the Chrysler
						does in evaluating its
						products and use the
						information to
						improve their own
						testing and compete
						more effectively
			0.00.06/5 !! DODO	701	NT/A	against Chrysler.
	11	Enclosure 11	8-23-06/7 mil BOB3-	Photo of test	N/A	Confidential on the
	Charralan	Confidential	10807-7.jpg	set-up		grounds that the document sets forth
	Chrysler	Business Information/				testing information
		Emails				and competitors could
		. Linaiis				determine the type of
						testing the Chrysler
						does in evaluating its
						products and use the

1	QUESTION	ENCLOSURE	FILE/DOCUMENT	DOCUMENT	BATES	CONFIDENITALITY
ì	#		NAME	DESCRIPTION	PAGE#	JUSTIFICATION
'	SOURCE					
						information to
						improve their own
						testing and compete
						more effectively
						against Chrysler.
ŀ	11	Enclosure 11	8-23-06/7 mil BOB4-	Photo of test	N/A	Confidential on the
		Confidential	10807-57.jpg	set-up		grounds that the
	Chrysler	Business				document sets forth
		Information/				testing information
		Emails				and competitors could
1						determine the type of
						testing the Chrysler
						does in evaluating its
						products and use the
						information to
						improve their own
						testing and compete
ı						more effectively
			•			against Chrysler.
	11	Enclosure 11	8-1-06/JNAP Returns	Email -	EA07-	Confidential on the
		Confidential	for July.pdf	Problem	007-	grounds that the
4	Chrysler	Business		solving	Chrysler-	document sets forth
	-	Information/		techniques	0546	how Chrysler goes
		Emails		_		about solving issues
						and competitors could
						use this information
						to improve their own
ļ						processes for problem
j						solving and compete
						more effectively
		<u>. </u>				against Chrysler.
	11	Enclosure 11	8-1-06/8D-7-36 NC	Email	EA07-	Confidential on the
		Confidential	07700008-IR214314	Attachment -	007-	grounds that the
	Siemens	Business	JNAP Remote Start	Problem	Chrysler-	document reveals
		Information/	Flash Error.pdf	Solving	0544-	Siemens and
		Emails	-		0545	Chrysler's
						confidential quality
						control processes and
						procedures and the
						manner in which
						Siemens and Chrysler
						go about identifying
						and resolving quality

	QUESTION #	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE#	CONFIDENITALITY JUSTIFICATION
7	SOURCE					
	11	Enclosure 11	8-1-06/8D-6-	Email	EA07-	and production issues. Competitors could use this information to improve their own quality control processes and procedures without incurring the related costs, thereby allowing them to compete more effectively against Siemens and Chrysler. Confidential on the
	1.1	Confidential	726IR214315-	Attachment -	007-	grounds that the
	Siemens	Business	NC07700008	Problem	Chrysler-	document reveals
		Information/	IR214371-	Solving	0541-	Siemens and
		Emails	NC077000023 Not		0543	Chrysler's
			Soldered.pdf			confidential quality
						control processes and
						procedures and the
						manner in which
						Siemens and Chrysler
						go about identifying
						and resolving quality and production issues.
						Competitors could use
						this information to
İ	•	•	•			improve their own
						quality control
						processes and
						procedures without
						incurring the related
						costs, thereby
						allowing them to
						compete more
						effectively against
						Siemens and
		- 1	# 10.00F	77 77	EAO#	Chrysler.
	11	Enclosure 11	5-19-06/Re:	Email –	EA07-	Confidential on the
	Claman I am	Confidential	Invitation: XK WK	Problem	007-	grounds that the document sets forth
L	Chrysler	Business	FCM pre-TAG conf	solving (some	Chrysler-	document sets forth

ſ	QUESTION	ENCLOSURE	FILE/DOCUMENT	DOCUMENT	BATES	CONFIDENITALITY
	#		NAME	DESCRIPTION	PAGE#	JUSTIFICATION
	SOURCE					
l		Information/	· call.pdf	attachments in	0538-	how Chrysler goes
l		Emails		public folder)	0540	about solving issues
						and competitors could use this information
ļ						to improve their own
						processes for problem
				·		solving and compete
						more effectively
						against Chrysler.
f	11	Enclosure 11	5-19-06/MY06 FCM	Email	EA07-	Confidential on the
ı		Confidential	Process Failure	attachment –	007-	grounds that the
	Chrysler	Business	Warranty Data 5-18-	Problem	Chrysler-	document sets forth
1	·	· Information/	06.pdf	solving and	0532-	how Chrysler goes
		Emails		analysis	0537	about solving issues
						and competitors could
١						use this information
1						to improve their own
١						processes for problem
1						solving and compete more effectively
			,			against Chrysler.
)	11	Enclosure 11	3-30-06/MY 07 WK	Email – Test	EA07-	Confidential on the
	11	Confidential	FCM P/N	results	007-	grounds that the
ľ	Chrysler	Business	04692106AF.pdf	1034113	Chrysler-	document sets forth
	Cittyster	Information/	0 100 2 100 1 1 1 1 1		0360	testing information
ļ		Emails				and competitors could
į						determine the type of
-						testing the Chrysler
						does in evaluating its
						products and use the
						information to
						improve their own
İ						testing and compete
						more effectively
	11	Enclosure 11	12-19-05/2006 FCM	Email –	EA07-	against Chrysler. Confidential on the
	11	Confidential	V2 new software.pdf	Problem	007-	grounds that the
	Chrysler	Business	vanew software.put	solving	Chrysler-	document sets forth
ļ	Ciliyatei	Information/		Joining .	0352	how Chrysler goes
		Emails				about solving issues
						and competitors could
						use this information
						to improve their own

	QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE#	CONFIDENITALITY JUSTIFICATION
	SOURCE					processes for problem solving and compete more effectively against Chrysler.
	Siemens	Enclosure 11 Confidential Business Information/ Emails	10-6-05/IR203298V1 Not Soldered Warranty MY 06.pdf	Email Attachment – Problem solving (1 st page only)	EA07- 007- Chrysler- 0343	Confidential on the grounds that the document reveals Siemens and Chrysler's confidential quality control processes and procedures and the manner in which Siemens and Chrysler go about identifying and resolving quality and production issues. Competitors could use this information to improve their own quality control processes and procedures without incurring the related costs, thereby allowing them to compete more effectively against Siemens and Chrysler.
	11 Chrysler	Enclosure 11 Confidential Business Information/ Emails	9-30-05/FW: Line 1 U1 Solderability Issue.pdf	Email – Problem solving	EA07- 007- Chrysler- 0604- 0605	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler.
h	11	Enclosure 11	9-30-05/Line 1 1-	Email	EA07-	Confidential on the

	QUESTION #	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE#	CONFIDENITALITY JUSTIFICATION
)			TATAIL	DESCRIPTION	1 AGL W	JOSTIFICATION
	Siemens	Confidential Business Information/ Emails	Chart Shift Chart 092805	attachment – Problem solving [Manufacturing In-Process Containment Measurements]	007- Chrysler- 0595	grounds that the document reveals Siemens and Chrysler's confidential quality control processes and procedures and the manner in which Siemens and Chrysler go about identifying and resolving quality and production issues. Competitors could use this information to improve their own quality control processes and procedures without incurring the related costs, thereby allowing them to compete more effectively against Siemens and
	11	Enclosure 11	9-30-05/Solder Bump	Email	EA07-	Chrysler. Confidential on the
	Chrysler	Confidential Business Information/ Emails	9-30-05/8D-6-205 U1	attachment – Problem solving Email	007- Chrysler- 0596- 0603	grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler. Confidential on the
	Siemens	Confidential Business Information/ Emails	Pins Not Soldered Paste Profile Coplainrity.pdf	attachment – Problem solving	007- Chrysler- 0592- 0594	grounds that the document reveals Siemens and Chrysler's
N		<u> </u>	<u> </u>		L	confidential quality

QUESTION #	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE#	CONFIDENITALITY JUSTIFICATION
SOURCE		<u> </u>			control processes and procedures and the manner in which Siemens and Chrysler go about identifying and resolving quality and production issues. Competitors could use this information to improve their own quality control processes and procedures without
					incurring the related costs, thereby allowing them to compete more effectively against Siemens and Chrysler.
11 Chrysler	Enclosure 11 Confidential Business Information/ Emails	9-24-05/Siemens FCM Open plant return 8d's.pdf	Email – Problem solving	EA07- 007- Chrysler- 0586- 0589	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler.
11 Siemens	Enclosure 11 Confidential Business Information/ Emails	9-24-05/8D-6-67 C518 Skewed.pdf	Email attachment – Problem solving	EA07- 007- Chrysler- 0581- 0582	Confidential on the grounds that the document reveals Siemens and Chrysler's confidential quality control processes and procedures and the manner in which Siemens and Chrysler go about identifying

	QUESTION #	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE#	CONFIDENITALITY JUSTIFICATION
	SOURCE					
						and resolving quality and production issues. Competitors could use this information to improve their own quality control processes and procedures without incurring the related costs, thereby allowing them to compete more effectively against Siemens and Chrysler.
	11	Enclosure 11	9-24-05/8D-6-68 J2	Email	EA07-	Confidential on the
	Ciamana	Confidential	Not Soldered.pdf	attachment –	007-	grounds that the
	Siemens	Business Information/		problem	Chrysler- 0583-	document reveals
		Emails		solving	0585	Siemens and
		Lilialis			0363	Chrysler's confidential quality
•						control processes and
						procedures and the
			•			manner in which
						Siemens and Chrysler
						go about identifying
ľ						and resolving quality
						and production issues.
						Competitors could use
						this information to
						improve their own
						quality control
		:				processes and
						procedures without
						incurring the related
						costs, thereby allowing them to
						compete more
						effectively against
						Siemens and
				•		Chrysler.
ŀ	11	Enclosure 11	9-23-05/Siemens	Email –	EA07-	Confidential on the
		Confidential	FCM open plant	problem	007-	grounds that the

1	QUESTION	ENCLOSURE	FILE/DOCUMENT	DOCUMENT	BATES	CONFIDENITALITY
\	#	LITELOSCIEL	NAME	DESCRIPTION	PAGE #	JUSTIFICATION
4	SOURCE			DESCRIPTION	I I I I I I	
-	Chrysler	Business	return 8d's.pdf	solving (p. 1 &	Chrysler-	document sets forth
	y	Information/		2 only)	0578-	how Chrysler goes
		Emails		,	0579	about solving issues
					12.72	and competitors could
						use this information
						to improve their own
						processes for problem
						solving and compete
						more effectively
						against Chrysler.
Г	11	Enclosure 11	8-25-05/Re: Status	Email –	EA07-	Confidential on the
		Confidential	Update – CSA Audit	problem	007-	grounds that the
	Chrysler	Business	Failure of FCM on	solving	Chrysler-	document sets forth
1		Information/	XK.pdf		0563-	how Chrysler goes
1		Emails			0570	about solving issues
						and competitors could
						use this information
						to improve their own
						processes for problem
						solving and compete
						more effectively
						against Chrysler.
	11	Enclosure 11	8-23-05/Re: Fw:	Email –	EA07-	Confidential on the
	C1 1	Confidential	8d's.pdf	problem	007-	grounds that the
	Chrysler	Business		solving	Chrysler- 0555-	document sets forth
		Information/ Emails			0559	how Chrysler goes
		Ellialis			0559	about solving issues and competitors could
	:					use this information
						to improve their own
						processes for problem
						solving and compete
						more effectively
	-					against Chrysler.
	11	Enclosure 11	8-18-05/Re: Status	Email –	EA07-	Confidential on the
		Confidential	Update – CSA Audit	problem	007-	grounds that the
	Chrysler	Business	Failure of FCM on	solving	Chrysler-	document sets forth
	-	Information/	XK.pdf		0547-	how Chrysler goes
		Emails	*		0554	about solving issues
						and competitors could
						use this information
	-					to improve their own
L						processes for problem

QUESTION	ENCLOSURE	FILE/DOCUMENT	DOCUMENT	BATES	CONFIDENITALITY
#		NAME	DESCRIPTION	PAGE#	JUSTIFICATION
SOURCE					
					solving and compete
					more effectively
1.1	77 1 11	0.0.05/10			against Chrysler.
11	Enclosure 11	8-8-05/Re:Night	Email –	EA07-	Confidential on the
GI I	Confidential	Letter-Jefferson North	problem	007-	grounds that the
Chrysler	Business	- 8/05/05.pdf	solving	Chrysler-	document sets forth
	Information/			0574-	how Chrysler goes
	Emails			0577	about solving issues
					and competitors could
					use this information
					to improve their own
					processes for problem
					solving and compete
					more effectively against Chrysler.
11	Enclosure 11	4-13-05/CAN B&C	Email –	EA07-	Confidential on the
	Confidential	Log for U0001 CAN	problem	007-	grounds that the
Chrysler	Business	C Fault.pdf	solving	Chrysler-	document sets forth
	Information/	C I dantipar	30141118	0529	how Chrysler goes
	Emails			0029	about solving issues
					and competitors could
7					use this information
					to improve their own
					processes for problem
		•			solving and compete
					more effectively
					against Chrysler.
11	Enclosure 11	4-13-05/CAN B& C	Email	EA07-	Confidential on the
	Confidential	U0001 Fault	attachment –	007-	grounds that the
Chrysler	Business	060002.pdf	problem	Chrysler-	document sets forth
	Information/		solving	0361-	how Chrysler goes
	Emails			0528	about solving issues
					and competitors could
					use this information
					to improve their own
					processes for problem
	i e				solving and compete
					more effectively
11	Enclosure 11	4-7-05/5.7 Fan	Email –	E A OZ	against Chrysler.
11	Confidential			EA07- 007-	Confidential on the
Chrysler	Business	Issue.pdf	problem solving		grounds that the document sets forth
Ciliyater	Information/		SOLVING	Chrysler- 0531	
i L	milorination/			0001	how Chrysler goes

]	QUESTION	ENCLOSURE	FILE/DOCUMENT	DOCUMENT	BATES	CONFIDENITALITY
	#		NAME	DESCRIPTION	PAGE #	JUSTIFICATION
	SOURCE					
j		Emails				about solving issues
						and competitors could
						use this information
ı		1				to improve their own
						processes for problem
	i					solving and compete
ļ						more effectively
						against Chrysler.
١	11	Enclosure 11	4-7-05/06 FCM	Email –	EA07-	Confidential on the
		Confidential	Hydralic Fan	problem	007-	grounds that the
	Chrysler	Business	Issue.pdf	solving	Chrysler-	document sets forth
		Information/		_ 	0530	how Chrysler goes
		Emails				about solving issues
						and competitors could
						use this information
						to improve their own
						processes for problem
						solving and compete
						more effectively
						against Chrysler.
ŀ			<u> </u>			
	11	Enclosure 11	3-24-05/Fw: F05-	Email –	EA07-	Confidential on the
)		Confidential	0550 (PA198037) Pwr	problem	007-	Confidential on the grounds that the
	11 Chrysler	Confidential Business			007- Chrysler-	Confidential on the grounds that the document sets forth
		Confidential Business Information/	0550 (PA198037) Pwr	problem	007- Chrysler- 0355-	Confidential on the grounds that the document sets forth how Chrysler goes
		Confidential Business	0550 (PA198037) Pwr	problem	007- Chrysler-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues
		Confidential Business Information/	0550 (PA198037) Pwr	problem	007- Chrysler- 0355-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could
		Confidential Business Information/	0550 (PA198037) Pwr	problem	007- Chrysler- 0355-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information
		Confidential Business Information/	0550 (PA198037) Pwr	problem	007- Chrysler- 0355-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own
		Confidential Business Information/	0550 (PA198037) Pwr	problem	007- Chrysler- 0355-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem
		Confidential Business Information/	0550 (PA198037) Pwr	problem	007- Chrysler- 0355-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete
		Confidential Business Information/	0550 (PA198037) Pwr	problem	007- Chrysler- 0355-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively
	Chrysler	Confidential Business Information/ Emails	0550 (PA198037) Pwr Dist Ctr.pdf	problem solving	007- Chrysler- 0355- 0359	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler.
		Confidential Business Information/ Emails Enclosure 11	0550 (PA198037) Pwr Dist Ctr.pdf 3-24-05/Power stud	problem solving Email	007- Chrysler- 0355- 0359	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler. Confidential on the
	Chrysler 11	Confidential Business Information/ Emails Enclosure 11 Confidential	0550 (PA198037) Pwr Dist Ctr.pdf	problem solving Email attachment —	007- Chrysler- 0355- 0359 EA07- 007-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler. Confidential on the grounds that the
	Chrysler	Confidential Business Information/ Emails Enclosure 11 Confidential Business	0550 (PA198037) Pwr Dist Ctr.pdf 3-24-05/Power stud	problem solving Email attachment — problem	007- Chrysler- 0355- 0359 EA07- 007- Chrysler-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler. Confidential on the grounds that the document sets forth
	Chrysler 11	Confidential Business Information/ Emails Enclosure 11 Confidential Business Information/	0550 (PA198037) Pwr Dist Ctr.pdf 3-24-05/Power stud	problem solving Email attachment —	007- Chrysler- 0355- 0359 EA07- 007- Chrysler- 0353-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler. Confidential on the grounds that the document sets forth how Chrysler goes
	Chrysler 11	Confidential Business Information/ Emails Enclosure 11 Confidential Business	0550 (PA198037) Pwr Dist Ctr.pdf 3-24-05/Power stud	problem solving Email attachment — problem	007- Chrysler- 0355- 0359 EA07- 007- Chrysler-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler. Confidential on the grounds that the document sets forth how Chrysler goes about solving issues
	Chrysler 11	Confidential Business Information/ Emails Enclosure 11 Confidential Business Information/	0550 (PA198037) Pwr Dist Ctr.pdf 3-24-05/Power stud	problem solving Email attachment — problem	007- Chrysler- 0355- 0359 EA07- 007- Chrysler- 0353-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler. Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could
	Chrysler 11	Confidential Business Information/ Emails Enclosure 11 Confidential Business Information/	0550 (PA198037) Pwr Dist Ctr.pdf 3-24-05/Power stud	problem solving Email attachment — problem	007- Chrysler- 0355- 0359 EA07- 007- Chrysler- 0353-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler. Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information
	Chrysler 11	Confidential Business Information/ Emails Enclosure 11 Confidential Business Information/	0550 (PA198037) Pwr Dist Ctr.pdf 3-24-05/Power stud	problem solving Email attachment — problem	007- Chrysler- 0355- 0359 EA07- 007- Chrysler- 0353-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler. Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own
	Chrysler 11	Confidential Business Information/ Emails Enclosure 11 Confidential Business Information/	0550 (PA198037) Pwr Dist Ctr.pdf 3-24-05/Power stud	problem solving Email attachment — problem	007- Chrysler- 0355- 0359 EA07- 007- Chrysler- 0353-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler. Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem
	Chrysler 11	Confidential Business Information/ Emails Enclosure 11 Confidential Business Information/	0550 (PA198037) Pwr Dist Ctr.pdf 3-24-05/Power stud	problem solving Email attachment — problem	007- Chrysler- 0355- 0359 EA07- 007- Chrysler- 0353-	Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler. Confidential on the grounds that the document sets forth how Chrysler goes about solving issues and competitors could use this information to improve their own

OUES	STION	ENCLOSURE	FILE/DOCUMENT	DOCUMENT	BATES	CONTENDENTED AT THESE
1	#	ENCLOSURE	NAME	DESCRIPTION	1	CONFIDENITALITY
,	" JRCE	·	NAME.	DESCRIPTION	PAGE#	JUSTIFICATION
100	IKCL					A main at City and I are
1	1	Enclosure 11	12-13-04/Fw: Fog	Email	E 4 07	against Chrysler.
1 1	. 1	Confidential	_	Email –	EA07-	Confidential on the
Chr	ysler	Business	Lamp Issue in	problem	007-	grounds that the
Cin.	ysici	Information/	FCM.pdf	solving (p.1-3	Chrysler-	document sets forth
		Emails		only)	0348-	how Chrysler goes
		Emans			0350	about solving issues
			•			and competitors could
						use this information
						to improve their own
						processes for problem
	İ					solving and compete
						more effectively
		D 1	44 # 04/5 5 4			against Chrysler.
1	.1	Enclosure 11	11-5-04/Re: Park	Emails –	EA07-	Confidential on the
	,	Confidential	Lamps	problem	007-	grounds that the
Chry	ysler	Business	unresponsive1.pdf,	solving	Chrysler-	document sets forth
		Information/	Re: Park Lamps		0345-	how Chrysler goes
		Emails	unresponsive 2.pdf		0346	about solving issues
		*				and competitors could
						use this information
)						to improve their own
						processes for problem
						solving and compete
						more effectively
	1	P 1 11	0.07.0489 3.57404			against Chrysler.
1	1	Enclosure 11	9-27-04/Re: MY 06	Email –	EA07-	Confidential on the
		Confidential	FCM V2 Reset	problem	007-	grounds that the
Chry	ysier	Business	Strategy.pdf	solving	Chrysler-	document sets forth
		Information/			0590-	how Chrysler goes
		Emails			0591	about solving issues
						and competitors could
	İ					use this information
İ	ŀ					to improve their own
						processes for problem
ĺ						solving and compete
						more effectively
			0.5.048			against Chrysler.
1	1	Enclosure 11	8-7-04/Incident	Email –	EA07-	Confidential on the
	1.	Confidential	Reports.pdf	problem	007-	grounds that the
Chry	sier	Business		solving and	Chrysler-	document sets forth
		Information/		testing data (p.	0571-	testing information
		Emails		1-2 only)	0572	and competitors could
						determine the type of

	QUESTION	ENCLOSURE	FILE/DOCUMENT	DOCUMENT	BATES	COMPUNENTED A LITTLE
	#	LIVEROSCIE	NAME	DESCRIPTION	1	CONFIDENITALITY
	SOURCE		IVAME	DESCRIPTION	PAGE#	JUSTIFICATION
	3001102	<u> </u>			 -	6-4'4 01 1
-						testing the Chrysler
						does in evaluating its
-						products and use the
						information to
ļ						improve their own
Ì						testing and compete
						more effectively
ŀ	15	Enclosure 15	C- 1 00' 1	T		against Chrysler.
ļ	15		Commander 20in hg	Test of brake	EA07-	Confidential on the
	Character	Confidential	vacuum.pdf	input vs. line	007-	grounds that the
	Chrysler	Business		pressure with	Chrysler-	document sets forth
-		Information		vacuum	0606	testing information
-						and competitors could
						determine the type of
ļ						testing the Chrysler
ı						does in evaluating its
l						products and use the
						information to
						improve their own
						testing and compete
					i	more effectively
Ļ						against Chrysler.
i	15	Enclosure 15	Commander no boost	Test of brake	EA07-	Confidential on the
ŀ	<i>α</i> , ,	Confidential	curve.pdf	input vs. Line	007-	grounds that the
	Chrysler	Business		pressure with	Chrysler-	document sets forth
ł	İ	Information		no vacuum	0607	testing information
						and competitors could
ı						determine the type of
		,				testing the Chrysler
	ļ					does in evaluating its
						products and use the
						information to
						improve their own
					•	testing and compete
						more effectively
L			<u>.</u>			against Chrysler.

Certificate in Support of Request for Confidentiality

- I, Stephan J. Speth pursuant to the provisions of 49 C.F.R. Part 512, state as follows:
- (1) I am Chrysler LLC's Director, Vehicle Certification, Compliance and Safety Affairs and I am authorized by Chrysler LLC to execute documents on its behalf;
- (2) I certify that the information contained in the attached documents 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);
- (3) I hereby request that the information contained in the indicated documents be protected on a permanent basis;
- (4) This certification is based on the information provided by the responsible Chrysler LLC 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 Chrysler LLC;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which Chrysler LLC has claimed confidential treatment has never been released or become available outside Chrysler LLC, except to certain contractors of Chrysler LLC with the understanding that such information must be maintained in strict confidence;
- (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 Chrysler LLC because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and
- (7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 4th day of Japaary, 2008

Stephan J. Speth

Certificate in Support of Request for Confidentiality

I, Russ Davisson, pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

- (1) I am Russ Davidson, Director of Safety, Specifications and Validation and I am authorized by Lear Corporation to execute documents on its behalf;
- (2) I certify that the information contained in the attached documents 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);
- (3) I hereby request that the information contained in the indicated documents be protected on a permanent basis;
- (4) This certification is based on the information provided by the responsible Lear Corporation 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 Lear Corporation;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which Lear Corporation has claimed confidential treatment has never been released or become available outside Lear Corporation, except to Chrysler LLC and certain contractors of Lear Corporation and/or Chrysler LLC with the understanding that such information must be maintained in strict confidence;
- (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 Lear Corporation because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and

(7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 2 day of Away, 2008

____EA07-007

Russ Davidson

Director: Safety, Specifications and Validation

Lear Corporation

Certificate in Support of Request for Confidentiality

- I, Bruce Wrenbeck pursuant to the provisions of 49 C.F.R. Part 512, state as follows:
- (1) I am the Vice President of Interior Controls and I am authorized by Continental Automotive Systems US, Inc. (formerly known as Siemens VDO Automotive Corporation) ("Continental") to execute documents on its behalf;
- (2) I certify that the information contained in the attached documents 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);
- (3) I hereby request that the information contained in the indicated documents be protected on a permanent basis;
- (4) This certification is based on the information provided by the responsible Continental 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 Continental;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which Continental has claimed confidential treatment has never been released or become available outside Continental, except to Chrysler LLC and certain contractors of Continental and/or Chrysler LLC with the understanding that such information must be maintained in strict confidence;
- (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 Continental because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and
- (7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 2nd day of January, 2008

Bruce Wrenbeck

Vice President Interior Closures

Brue March

Continental Automotive Systems US, Inc.