



CHRYSLER

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

NHTSA
WASHINGTON, DC 20590
2008 JAN -7 P 5:17
OFFICE OF CHIEF
COUNSEL

Re: Request for Confidential Treatment of Business Information Submitted in EA07-1
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).¹ 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 known 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))

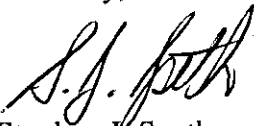
Because Chrysler anticipates that the information will be competitively sensitive indefinitely, Chrysler requests that the information be accorded confidential treatment permanently.

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

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

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY 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 Chrysler.
10 Chrysler	Enclosure 10 Confidential Business Information	NGC4 perf std.pdf	Engine and transmission performance standard	EA07-007-Chrysler-0161-0268	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 # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
	Emails				and competitors could 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 against Chrysler.
11 Chrysler	Enclosure 11 Confidential Business Information/ Emails	8-23-06/Forever Requirement for Solder Bump and 7 mil Screen.pdf	Email attachment – process change notification	EA07-007-Chrysler-0561-0562	Competitors could determine the design and manufacturing processes and operational strengths of Chrysler and could improve their own processes to compete more effectively against Chrysler.
11 Chrysler	Enclosure 11 Confidential Business Information/ Emails	8-23-06/6 mil BOB1-10807-54.jpg	Photo of test set-up	N/A	Confidential on the grounds that the document sets forth testing information and competitors could 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 against Chrysler.
11 Chrysler	Enclosure 11 Confidential Business Information/ Emails	8-23-06/7 mil BOB3-10807-7.jpg	Photo of test set-up	N/A	Confidential on the grounds that the document sets forth testing information and competitors could determine the type of testing the Chrysler does in evaluating its products and use the

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
					information to improve their own testing and compete more effectively against Chrysler.
11 Chrysler	Enclosure 11 Confidential Business Information/ Emails	8-23-06/7 mil BOB4-10807-57.jpg	Photo of test set-up	N/A	Confidential on the grounds that the document sets forth testing information and competitors could 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 against Chrysler.
11 Chrysler	Enclosure 11 Confidential Business Information/ Emails	8-1-06/JNAP Returns for July.pdf	Email - Problem solving techniques	EA07-007-Chrysler-0546	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	8-1-06/8D-7-36 NC 07700008-IR214314 JNAP Remote Start Flash Error.pdf	Email Attachment - Problem Solving	EA07-007-Chrysler-0544-0545	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

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
					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 Siemens	Enclosure 11 Confidential Business Information/ Emails	8-1-06/8D-6-726IR214315-NC07700008 IR214371-NC077000023 Not Soldered.pdf	Email Attachment - Problem Solving	EA07-007-Chrysler-0541-0543	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	5-19-06/Re: Invitation: XK WK FCM pre-TAG conf	Email – Problem solving (some	EA07-007-Chrysler-	Confidential on the grounds that the document sets forth

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
	Information/ Emails	call.pdf	attachments in public folder)	0538- 0540	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 Chrysler	Enclosure 11 Confidential Business Information/ Emails	5-19-06/MY06 FCM Process Failure Warranty Data 5-18-06.pdf	Email attachment – Problem solving and analysis	EA07-007-Chrysler-0532-0537	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 Chrysler	Enclosure 11 Confidential Business Information/ Emails	3-30-06/MY 07 WK FCM P/N 04692106AF.pdf	Email – Test results	EA07-007-Chrysler-0360	Confidential on the grounds that the document sets forth testing information and competitors could 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 against Chrysler.
11 Chrysler	Enclosure 11 Confidential Business Information/ Emails	12-19-05/2006 FCM V2 new software.pdf	Email – Problem solving	EA07-007-Chrysler-0352	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

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
					processes for problem solving and compete more effectively against Chrysler.
11 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.
11	Enclosure 11	9-30-05/Line 1 1-	Email	EA07-	Confidential on the

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
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 Chrysler.
11 Chrysler	Enclosure 11 Confidential Business Information/ Emails	9-30-05/Solder Bump DOES.pdf	Email attachment – Problem solving	EA07-007-Chrysler-0596-0603	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	9-30-05/8D-6-205 U1 Pins Not Soldered Paste Profile Coplainrity.pdf	Email attachment – Problem solving	EA07-007-Chrysler-0592-0594	Confidential on the grounds that the document reveals Siemens and Chrysler's confidential quality

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
					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 # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
					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 Siemens	Enclosure 11 Confidential Business Information/ Emails	9-24-05/8D-6-68 J2 Not Soldered.pdf	Email attachment – problem solving	EA07- 007- Chrysler- 0583- 0585	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	Enclosure 11 Confidential	9-23-05/Siemens FCM open plant	Email – problem	EA07- 007-	Confidential on the grounds that the

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
Chrysler	Business Information/ Emails	return 8d's.pdf	solving (p. 1 & 2 only)	Chrysler-0578-0579	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 Chrysler	Enclosure 11 Confidential Business Information/ Emails	8-25-05/Re: Status Update – CSA Audit Failure of FCM on XK.pdf	Email – problem solving	EA07-007-Chrysler-0563-0570	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 Chrysler	Enclosure 11 Confidential Business Information/ Emails	8-23-05/Re: Fw: 8d's.pdf	Email – problem solving	EA07-007-Chrysler-0555-0559	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 Chrysler	Enclosure 11 Confidential Business Information/ Emails	8-18-05/Re: Status Update – CSA Audit Failure of FCM on XK.pdf	Email – problem solving	EA07-007-Chrysler-0547-0554	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

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
					solving and compete more effectively against Chrysler.
11 Chrysler	Enclosure 11 Confidential Business Information/ Emails	8-8-05/Re:Night Letter-Jefferson North – 8/05/05.pdf	Email – problem solving	EA07-007-Chrysler-0574-0577	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 Chrysler	Enclosure 11 Confidential Business Information/ Emails	4-13-05/CAN B&C Log for U0001 CAN C Fault.pdf	Email – problem solving	EA07-007-Chrysler-0529	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 Chrysler	Enclosure 11 Confidential Business Information/ Emails	4-13-05/CAN B&C U0001 Fault 060002.pdf	Email attachment – problem solving	EA07-007-Chrysler-0361-0528	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 Chrysler	Enclosure 11 Confidential Business Information/ Emails	4-7-05/5.7 Fan Issue.pdf	Email – problem solving	EA07-007-Chrysler-0531	Confidential on the grounds that the document sets forth how Chrysler goes

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
	Emails				about solving issues and competitors could use this information to improve their own processes for problem solving and compete more effectively against Chrysler.
11 Chrysler	Enclosure 11 Confidential Business Information/ Emails	4-7-05/06 FCM Hydraulic Fan Issue.pdf	Email – problem solving	EA07-007-Chrysler-0530	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 Chrysler	Enclosure 11 Confidential Business Information/ Emails	3-24-05/Fw: F05-0550 (PA198037) Pwr Dist Ctr.pdf	Email – problem solving	EA07-007-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.
11 Lear	Enclosure 11 Confidential Business Information/ Emails	3-24-05/Power stud insertion.pdf	Email attachment – problem solving	EA07-007-Chrysler-0353-0354	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

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
					against Chrysler.
11 Chrysler	Enclosure 11 Confidential Business Information/ Emails	12-13-04/Fw: Fog Lamp Issue in FCM.pdf	Email – problem solving (p.1-3 only)	EA07-007-Chrysler-0348-0350	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 Chrysler	Enclosure 11 Confidential Business Information/ Emails	11-5-04/Re: Park Lamps unresponsive1.pdf, Re: Park Lamps unresponsive 2.pdf	Emails – problem solving	EA07-007-Chrysler-0345-0346	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 Chrysler	Enclosure 11 Confidential Business Information/ Emails	9-27-04/Re: MY 06 FCM V2 Reset Strategy.pdf	Email – problem solving	EA07-007-Chrysler-0590-0591	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 Chrysler	Enclosure 11 Confidential Business Information/ Emails	8-7-04/Incident Reports.pdf	Email – problem solving and testing data (p. 1-2 only)	EA07-007-Chrysler-0571-0572	Confidential on the grounds that the document sets forth testing information and competitors could determine the type of

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
					testing the Chrysler does in evaluating its products and use the information to improve their own testing and compete more effectively against Chrysler.
15 Chrysler	Enclosure 15 Confidential Business Information	Commander 20in hg vacuum.pdf	Test of brake input vs. line pressure with vacuum	EA07- 007- Chrysler- 0606	Confidential on the grounds that the document sets forth testing information and competitors could 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 against Chrysler.
15 Chrysler	Enclosure 15 Confidential Business Information	Commander no boost curve.pdf	Test of brake input vs. Line pressure with no vacuum	EA07- 007- Chrysler- 0607	Confidential on the grounds that the document sets forth testing information and competitors could 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 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 January, 2008



Stephan J. Speth

Certificate in Support of Request for Confidentiality

I, Russ Davidson, 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 January, 2008

Russ Davidson

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
Continental Automotive Systems US, Inc.