



April 23, 2007

Anthony Cooke, Esq.
Office of Chief Counsel
NHTSA Safety Assurance
Room #5219
400 Seventh Street, S.W.
Washington, D.C. 20590

N070035

NVS-213kmb
PE07-006

Dear Mr. Cooke:

Enclosed with this letter are three copies of General Motors' (GM) April 20, 2007 response to NHTSA's information request (IR), dated February 8, 2006, regarding a Preliminary Evaluation (PE07-006) to investigate allegations of non-crash related fires originating in the engine compartment in certain model year (MY) 1999 through 2002 Pontiac Grand Prix GTP vehicles. Two copies include the confidential documents and the third does not.

GM requests the documents stamped "GM Confidential" be afforded confidential treatment by the NHTSA without a time limitation. These documents are included in the electronic CD identified as Attachment 2 CD GM Confidential Data, Response to Q8. This information is not customarily made public by GM 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 table identifies the specific types of confidential information contained in each GM document for which confidentiality is sought:

| Response | Document Name | Information Types |
|----------|--|------------------------|
| 8-3 | TOC EWOs.doc | GM Engineering changes |
| 8-4 | HMD_NYC Police Summary.xls, WO 145528 - CANC - Oil Fill Tube.pdf, WO ANPMJ - Prod RIs - Oil Drip Shield.pdf, WO ANPMJA - PN Change - Oil Drip Shield.pdf, WO ARCYV - CANC - Oil Fill Tube.pdf, WO ARCYVA - Exp RIs - Oil fill tube.pdf, WO AXBXN - Prod RIs - Oil Fill Tube.pdf, WO AXBXN - Prod RIs - Oil Fill Tube.pdf | GM Engineering Changes |
| 8-5 | L36 L67 Thermal Data Comparison.xls | GM Test Analysis |
| 8-6 | N070035 GM Reports read as of 4-10-07.pdf | GM Report analysis |
| 8-7 | Fuel system EWO summary .xls | GM Engineering changes |

To the best of our knowledge, no prior determinations of the confidentiality of these documents have been made by the NHTSA, other Federal Agencies, or the Federal Courts. Documents such as those containing engineering drawings, engineering specifications, failure analysis, testing procedures and test analysis have, to the best of our knowledge, normally been granted confidential treatment by the NHTSA in the past.

GM requests confidential treatment of the information in these documents because it includes engineering specifications, testing specifications, evaluation conclusions and design failure mode

Product Investigations

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N070035 Confidentiality Request.doc



analysis conclusions, 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 documents in response to Question 8, on the CD labeled Attachment 2 CD, GM Confidential Data disclose GM's engineering specifications, engineering changes, testing procedures. The vehicle testing and development of product changes involves significant time, development effort, expertise and money to plan and execute. The documents associated with this effort provide valuable information that a competitor would otherwise have to spend its time and money to develop and investigate. This would deprive GM of the competitive advantage of its efforts without any compensation.

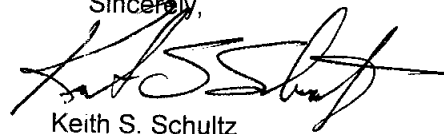
The documents in response to Question 8, on the CD labeled Attachment 2 CD, GM Confidential Data disclose test data analysis and report analysis information. The time required for vehicle development and testing along with engineering analysis of the test data and GM reports involves significant time, development effort, expertise and money to plan and execute. The documents associated with this effort provide valuable information that a competitor would otherwise have to spend its time and money to develop and investigate. This would deprive GM of the competitive advantage of its efforts without any compensation.

General Motors treats the above material as confidential proprietary information available only to authorized General Motors and supplier personnel and not otherwise available to the public. The document is maintained under a record-keeping system which is intended to control dissemination of this material within General Motors, and to assure that it is not disseminated outside the Corporation, except as described in the attached certification made pursuant to 49 CFR Part 512.4(e).

The corresponding electronic copies of these documents are being provided on a CD labeled "GM CONFIDENTIAL." 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.

Please contact me if you require further information about this request.

Sincerely,



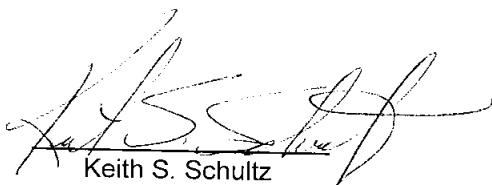
Keith S. Schultz
Senior Manager
Product Investigations

Enclosures

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, Keith S. Schultz, pursuant to the provisions of 49 CFR Part 512, state as follows:

- (1) I am a Senior Manager in the Product Investigations department 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 April 23, 2007 is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4) 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 23rd day of April 2007.



Keith S. Schultz
Senior Manager
Product Investigations



Friday, April 20, 2007

Anthony Cooke, Esq.
Office of Chief Counsel
NHTSA Safety Assurance
Room #5219
400 Seventh Street, S.W.
Washington, D.C. 20590

Re: Bend All Automotive Incorporated confidentiality request, NV5-213kmb, PE07-06

Dear Mr. Cooke:

Bend All Automotive Incorporated (Bend All) makes this request pursuant to 49 CFR Part 512 for confidential treatment of certain Bend All documents, identified below, that were submitted by General Motors Corporation (GM) in conjunction with the above referenced matter.

Bend All has provided GM with the following documents in connection to GM's response to question 8.3 of NHTSA's letter request.

| <u>Document Name</u> | <u>Information Type</u> |
|--|-------------------------|
| BENDALL_9.5 Nominal hose ID.pdf | Validation data |
| BENDALL_0.375 inch crimp coupling joint validation.pdf | Validation data |

This validation submission contains design and manufacturing information related to our hose crimp geometry, which has been developed at significant cost to Bend All Automotive. The competitive harm for general disclosure of this information would be substantial, since the application of this crimp is at the core of our fluid handling assembly business and because global competition in this business is intense.

This information is currently available only to a limited number of Bend All Automotive employees who are obligated to keep this information confidential as part of their employment conditions, as well as GM employees associated with the validation approval. Further, it is our understanding that GM requires their employees to keep this information confidential and that this information is not shared with any other party.

To the best of Bend All's knowledge, no prior determination have been made by NHTSA of the confidentiality of the referenced documents. However, to the best of our knowledge, documents of the type at issue here have normally been afforded confidential treatment in the past.

Bend All requests that notice of the NHTSA's determination concerning the confidentiality of the referenced materials be addressed to Jeff Thomas. Finally, if NHTSA receives a request for disclosure of any or all of the referenced documents or the information that they contain, Bend All



requests notification of NHTSA's receipt of each such request, and, if necessary, an opportunity to further explain the reasons why such material reflects trade secrets and proprietary information that is exempt from disclosure under applicable statutes and regulations.

Thank you for your assistance and cooperation. Please call me at 519.623.2001 ext 241 if you have any questions about this request.

Sincerely,
Bend All Automotive Inc.

Jeffrey Thomas
Sales and Engineering Manager

Best Regards,

BEND ALL AUTOMOTIVE INC.

A handwritten signature in black ink, appearing to read "Jeffrey J. Thomas", with a long horizontal line extending to the right.

Jeffrey J. Thomas
Sales and Engineering Manager
519.623.2001 x 241



CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, Jeffrey Thomas, pursuant to the provisions of 49 CFR part 512, states as follows:

- (1) I am the Sales and Engineering Manager of Bend All Automotive, Incorporated, and am authorized to execute this certificate on their behalf.
- (2) I certify the information contained in the documents identified in the letter dated April 20, 2007 is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 522(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 Bend All 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 Bend All has claimed confidential treatment has never been released or made available outside Bend All and 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 Bend All because of unauthorized or inadvertent disclosure.
- (7) I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 20th day of April, 2007.

A handwritten signature in black ink, appearing to be "JT" with a flourish, written over the printed name.

Jeffrey Thomas
Sales and Engineering Manager, Bend All Automotive Incorporated