



GENERAL MOTORS NORTH AMERICA
Structure & Safety Integration

NHTSA
WASHINGTON, DC 20590

September 4, 2007

2007 SEP -5 P 3: 39

CONFIDENTIAL

OFFICE OF CHIEF
COUNSEL

Anthony Cooke, Esq.
Office of Chief Counsel
NHTSA
Suite W41-227
1200 New Jersey Avenue S.E.
Washington, D.C. 20590

N070146 Supplement 1

NVS-212.pco
PE07-025

Dear Mr. Cooke:

Enclosed with this letter are three copies of General Motors' (GM) September 4, 2007 supplement response to NHTSA's information request (IR), dated May 15, 2007, regarding alleged failure, tearing, bending or loosening of the hitch receiver for 2002 Model Year (MY) C/K 2500 series Suburban/Yukon and Silverado/Sierra/Avalanche subject vehicles. Two copies include the confidential documents and the third does not.

GM requests that the documents stamped "GM Confidential" included in ATT_2_GM_CONF Disc; folders labeled "Q_08_B" and "Q_08_E" are afforded confidential treatment without a time limitation by NHTSA. 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 identifies the specific types of confidential information contained in each folder document:

RESPONSE	DOCUMENT FOLDER NAME	INFORMATION TYPES
8	Q_8_B Rprt	GM Engineering development and validation test process and test results including engineering photos and communications
8	Q_8_E Mfgr	GM Manufacturing global quality tracking system and communications

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

The documents in ATT_2_GM_CONF Disc; folders labeled "Q_08_B" and "Q_08_E" disclose GM's engineering specifications, product and process development, performance analysis and test process, and quality tracking system for product improvement. The development of engineering product and process involves time, effort, and skill. Knowledge of how GM assembles and analyzes a product would give a competitor valuable information that it would otherwise have to spend its time and money to develop and therefore would deprive GM of the competitive advantage of its efforts without any compensation.

GM treats the above material as confidential proprietary information available only to authorized GM and supplier personnel and not otherwise available to the public. The documents are maintained under a record-keeping system which is intended to control dissemination of this

Product Investigations

Mail Code: 480-210-G11 • 30001 Van Dyke Road • Warren, MI 48090



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

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

Sincerely,

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

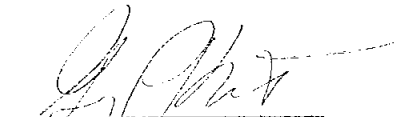
Gay P. Kent
Director,
Product Investigations

Attachment

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

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

- (1) I am Director in Product Investigations of General Motors Corporation (GM) 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 September 4, 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 4th day of September, 2007.



Gay P. Kent
Director,
Product Investigations