



NHTSA
WASHINGTON, DC 20590

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OFFICE OF CHIEF
COUNSEL

James P. Vondale, Director
Automotive Safety Office
Environmental & Safety Engineering

Fairlane Plaza South
330 Town Center Drive
Dearborn, MI 48126-2738 USA

February 29, 2008

Mr. Anthony M. Cooke
Chief Counsel
Office of the Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE/W41-322
Washington, DC 20590

Dear Mr. Cooke:

Subject: Request Under 49 CFR Part 512 for Confidential Treatment of Information

Two copies of confidential information referenced in the Ford Motor Company (Ford) February 29, 2008, response to the agency's January 11, 2008, inquiry, PE08-001, are attached. Also attached for your reference is a copy of the non-confidential portion of Ford's response to the ODI's information request.

This letter provides support for Ford's claim of confidentiality in accordance with 49 CFR Part 512.8. Ford requests confidential treatment for the documents included in Appendix G because the documents are not customarily released to the public by Ford and because the documents contain confidential business information, the disclosure of which would likely cause substantial competitive harm to Ford (as contemplated in 49 CFR § 512.15, 5 and U.S.C. § 552(b)(4)). In response to direction provided by your office concerning prior confidentiality submissions, the confidential documents in this submission are organized into categories as set forth in Attachment I.

Ford documents of the types listed are maintained under a record keeping system which is intended to control dissemination of this material within Ford, and to assure that the material is not disseminated outside of Ford, except as described in the attached certification, which is made pursuant to 49 CFR Part 512.4(b).

Compact discs containing electronic copies of documents provided in Appendix G are labeled "CONFIDENTIAL."

The documents contain commercial information and are exempt from disclosure pursuant to 49 CFR § 512.15, 5 U.S.C. § 552(b)(4). The pages of the documents for which Ford requests confidential treatment are labeled "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" or "CONFIDENTIAL BUSINESS INFORMATION" as appropriate.

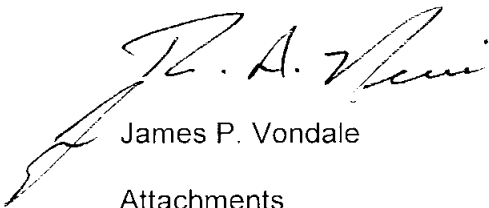


Ford requests that these documents be granted confidential treatment by the agency for a period of ten years. Earlier disclosure of these documents, in Ford's opinion, would result in substantial competitive harm.

In the event that the agency should conclude that all or part of the submitted information is not to be given confidential treatment, Ford asks the agency to provide reasonable notice of not less than ten working days prior to any contemplated disclosure in order that Ford may pursue such legal remedies as it may choose. Please direct all written notices to me at Ford Motor Company, Suite 500, Fairlane Plaza South, 330 Town Center Drive, Dearborn, Michigan 48126. Please direct all non-written communication to Mr. Paul Fabien who may be contacted by telephone at (313) 621-1656.

Thank you for your continuing courtesy.

Sincerely,



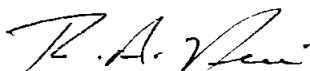
James P. Vondale

Attachments

**CERTIFICATE IN SUPPORT OF REQUEST
FOR CONFIDENTIALITY**

I, R. A. Nevi, pursuant to the provisions of 49 CFR Part 512, state as follows:

1. I am Assistant Director, Global Automotive Safety Compliance, Automotive Safety Office, and I am authorized by Ford Motor Company (Ford) to execute this certificate on its behalf;
2. The information contained in the attachment to Ford's letter to NHTSA's Office of the Chief Counsel dated February 29, 2008, contains confidential and proprietary data and is submitted with the claim that it is entitled to confidential treatment under 5 U.S.C., § 552(b)(4);
3. A member of my staff has inquired of the responsible Ford personnel who have authority in the normal course of business to release the type of information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Ford;
4. Based upon such inquiries, to the best of my knowledge, information and belief, the information for which Ford has claimed confidential treatment has never been released or become available outside Ford except as hereinafter specified:
 - Portions of these documents may have been or may be shared with Ford suppliers with the expectation that they will be kept confidential.
 - During the course of defending itself in litigation, Ford may have been, or may be required to produce such information.
5. 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 Ford because of unauthorized or inadvertent disclosure, except as stated in Paragraph 4; and
6. I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 29th day of February 2008.



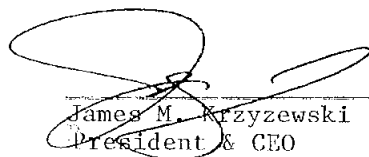
R. A. Nevi

Certificate in Support of Request for Confidentiality

I, James Krzyzewski, pursuant to the provisions of 49 CFR part 512, state as follows:

1. I am President/CEO of Nyloncraft, Inc. ("Nyloncraft"), and I am authorized by Nyloncraft to execute this certificate on its behalf.
2. I certify that the information contained in the documents referenced on the attached schedule that is being submitted to the agency by Ford Motor Company in response to NHTSA investigation PE08-001 is confidential and proprietary data that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4). The basis for the claim of confidentiality is set forth in the attached.
3. I hereby request that the information contained in the documents be protected for a period of Ten (10) years.
4. This certification is based on the information provided by the responsible Nyloncraft 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 of Nyloncraft.
5. Based upon that information, to the best of my knowledge, information and belief, the information for which Nyloncraft has claimed confidential treatment has never been released or become available outside Nyloncraft, except as hereinafter specified:
 - Portions of these documents may have been or may be shared with Ford and/or other customers or suppliers of Nyloncraft with the expectation that they will be kept confidential.
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 Nyloncraft.
7. I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 26 day of February, 2008


James M. Krzyzewski
President & CEO

A		Documents created by Ford Motor Company, or on behalf of Ford Motor Company by a third party vendor or supplier.	Information concerning or revealing Ford's testing programs, including test requests, specifications and results could be used by competitors to improve their own products and processes without the need to invest the substantial resources invested by Ford.
B	Engineering Design Drawings	Ford Motor Company's and its suppliers' release level drawings of its vehicles, systems, sub-systems, and components.	The details contained in release level drawings contain Ford proprietary intellectual property and could be used by competitors to develop or improve their own products and processes without the need to invest the substantial resources invested by Ford.
C	Engineering Design Specifications	Internal Ford Motor Company document containing necessary information to be used by Ford and its suppliers to produce or evaluate parts which are usually issued in conjunction with engineering drawings during the design and development of its vehicles.	Information concerning Ford's engineering design processes could be used by competitors to develop or improve their own products and processes without the need to invest the substantial resources invested by Ford.
D	Test Results / Reports / Analysis	Documents reflecting the results of engineering testing conducted by Ford Motor Company, or on behalf of Ford Motor Company by a third party vendor or supplier.	Information concerning or revealing Ford's testing programs, including test requests, specifications and results could be used by competitors to improve their own products and processes without the need to invest the substantial resources invested by Ford.

Nyloncraft Request for Consideration of Confidential Treatment of Documents

Tab	Document Type	Document Description	Reason for Confidential Treatment
E	Supplier Design Verification Plan and Report (DVP&R)	Internal Ford supplier document that reflects test plans, procedures and results conducted by Ford Motor Company, or on behalf of Ford Motor Company by a third party vendor or supplier.	Information concerning or revealing Ford's supplier's testing programs, including test requests, specifications and results could be used by competitors to improve their own products and processes without the need to invest the substantial resources invested by the Ford supplier.
F	Supplier Test Results / Reports / Analysis	Documents reflecting the results of engineering testing conducted by Ford Motor Company, or on behalf of Ford Motor Company by a third party vendor or supplier.	Information concerning or revealing Ford's supplier's testing programs, including test requests, specifications and results could be used by competitors to improve their own products and processes without the need to invest the substantial resources invested by Ford.