



GENERAL MOTORS CORPORATION  
Vehicle Structure & Safety Integration

June 6, 2008

Anthony Cooke, Esq.  
Office of Chief Counsel  
National Highway Traffic Safety Administration  
West Building, Room W41-227  
1200 New Jersey Avenue S.E.  
Washington, D.C. 20590

N080048 Supplement 1  
Presentation

NVS-213dlr  
PE08-010

Dear Mr. Cooke:

Enclosed with this letter are two copies of the supplier's heated washer fluid module analysis report from the April 8, 2008 component review with personnel from the NHTSA Office of Defects Investigation. GM is submitting this information voluntarily in response to the NHTSA investigation N080048, at the request of Michael H. Packard, NHTSA Federal Engineer - Safety Defects.

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

Sincerely,

Gay P. Kent  
Director  
Product Investigations

Enclosure

**Product Investigations**

Mail Code: 480-210-G11 • 30001 Van Dyke Road • Warren, MI 48090  
PE08-010\_N080048 Voluntary Submission Confidentiality Request.doc

**N080048 Supplement 1**  
**PE08-010**

**SUPPLIER CONFIDENTIAL LETTER**



June 4, 2008

NHTSA  
WASHINGTON, DC 20590  
2008 JUN 10 A 10:10  
OFFICE OF CHIEF  
COUNSEL

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

Dear Mr. Cooke:

Microheat, Inc. submits this request pursuant to 49 CFR Part 512, for the confidential treatment of documents submitted by General Motors Corporation (GM) in response to the National Highway Traffic Safety Administration's (NHTSA's) investigation N080048.

Microheat, Inc. requests that the document submitted to you via General Motors listed on this form or any document that references Microheat be afforded confidential treatment without a time limitation by the NHTSA. This information is proprietary and not customarily made public by Microheat, Inc. The information 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 identified the specific types of confidential information contained in each document for which confidentiality is sought:

**Document Name**

**Failure Analysis of CR-6-0475 (Ohio Unit)**

The reason that Microheat, Inc. requests confidential treatment of the information is that the files disclose Microheat's system and results of market quality information evaluation. Knowledge of how Microheat handles and evaluates market quality information would give a competitor valuable information that it would otherwise have to spend time and money to develop, and therefore would deprive Microheat of the competitive advantage of its efforts without compensation. The system operation information would give competitors insight into Microheat's methodologies and business practices for evaluating the market quality information.

Among the files in response Microheat disclosed product specifications, development and performance testing information. Knowledge of how Microheat specifies, tests and evaluates 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 Microheat of the competitive advantage of its efforts without any compensation. The component development and test information would give competitors insight into Microheat's methodologies and business practices for evaluating its products.

The file may also disclose Microheat's methodologies and engineering practices for analyzing field information. This special testing shows Microheat's unique approaches for analyzing failure mode of the subject components which involves experience, time, effort, and skill. Knowledge of how Microheat specifies, tests and evaluates 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 Microheat of the competitive advantage of its efforts without any compensation. The test information would give competitors insight into Microheat's methodologies and business practices for evaluating its products.

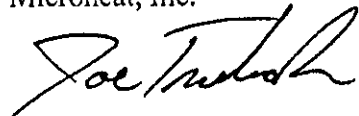
Microheat treats the above materials as confidential proprietary information available only to authorized Microheat, GM, and supplier personnel who have a business need for them, and the information is not otherwise available to the public.

If you have any inquiries concerning this request, please direct them to:

Gal Golod  
Executive Vice President Legal Affairs  
Microheat, Inc.  
38755 Hills Tech Drive  
Farmington Hills, MI 48331  
(248) 489-2400

Sincerely,

Microheat, Inc.



Joseph Trubak  
Vice President, GM Business Unit

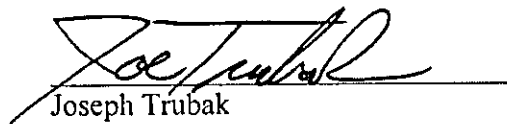
JT/dlg

Letter to Anthony Cooke  
Supplement 1 Confidentiality Request  
June 4, 2008  
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**CERTIFICATE IN SUPPORT OF**  
**REQUEST FOR CONFIDENTIALITY**

I, Joseph Trubak, pursuant to the provision of 49 CFR Pat 512, state as follows:

- 1) I am Senior Manager of Microheat and am authorized to execute this certificate of its behalf.
- 2) I certify that the information contained in the documents identified in the letter dated June 4, 2008 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 Microheat 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 Microheat has claimed confidential treatment has never been released or made available outside Microheat and supplier or customer personnel.
- 6) I make no representations beyond those contained in the certificate and, in particular, I make no representations as to whether this information may become available outside Microheat because of unauthorized or inadvertent disclosure.
- 7) I certify under penalty of perjury that the foregoing is true and correct. Executed on this 4<sup>th</sup> day of June 2008.

  
Joseph Trubak  
Vice President, GM Business Unit  
Microheat, Inc.