

HONDA

American Honda Motor Co., Inc.
1919 Torrance Boulevard
Torrance, CA 90501-2746
Phone (310) 783-2000

January 7, 2009

Office of the Chief Counsel
NATIONAL HIGHWAY TRAFFIC SAFETY
ADMINISTRATION
1200 New Jersey Ave., SE
Washington, DC 20590

**Re: PE08-026 (2005-07 Honda Odyssey Power Tailgate)
Request for Reconsideration of Confidential Treatment**

Dear Chief Counsel:

On behalf of American Honda, and Stabilus GmbH, and Stabilus USA ("Stabilus"), I am herewith submitting a Certificate in Support of Request for Confidentiality, for your review. We request your reconsideration of the denial of confidentiality, as stated in your letter of December 4, 2008 which was received in this office on December 9, 2008. This submission is made in accordance with 49 CFR Sect. 512.4(b).

Please advise me of your decision on this matter at your earliest convenience.

Very truly yours,

AMERICAN HONDA MOTOR CO., INC.

William Willen / JWA

William R. Willen
Managing Counsel
Product Regulatory Office

WRW:nis

Enclosure

3. I hereby request that the information contained in the Submissions be protected from disclosure as disclosure of this information would result in significant competitive damage to Stabilus.

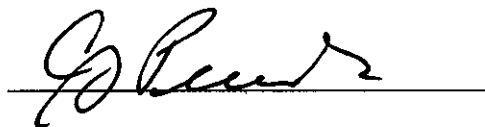
4. This certification is based on the information provided by the responsible Stabilus personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Stabilus;

5. Based upon that information, to the best of my knowledge, information and belief, the information for which Stabilus has claimed confidential treatment has never been released or become available outside Stabilus except as required as part of this NHTSA investigation.

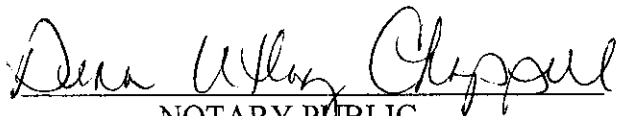
6. I make no representations beyond those contained in this Certificate and, in particular, I make no representations as to whether this information may become available outside Stabilus because of unauthorized or inadvertent disclosure.

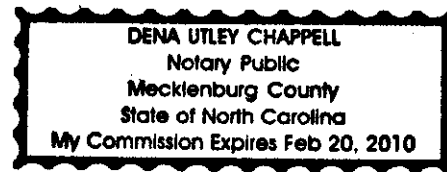
I certify under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on the 6th day of January, 2009.



SUBSCRIBED and SWORN to before
me this 6 day of January, 2009.


NOTARY PUBLIC



CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, Craig Pospiech, pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

1. I am Vice President of Finance for Stabilus, Inc. (USA) and I am authorized by Stabilus GmbH and Stabilus USA (collectively "Stabilus") to execute this certificate on its behalf;

2. I certify that the information provided to the National Highway Traffic Safety Administration in the matter of PE08-026 (2005 Honda Odyssey Power Liftgate) in Honda's August 4, 2008 submission entitled "PE08-026 2005-07 ODYSSEY TAILGATE - RESPONSE TO Q8-Q29 AUG. 4, 2008 (AUG 4TH CD-ROM)" and Honda's August 8, 2008 submission entitled "PE08-026 2005-07 ODYSSEY TAILGATE ADDITIONAL RESPONSE TO Q8 AUG. 8, 2008 (Aug. 8th CD-ROM)" (referred to as "the Submissions") 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)(as incorporated by reference in and modified by the statute under which the information is being submitted). Specifically, the Submissions includes the following information from Stabilus:

SPEC test result from Stabilus CONFIDENTIAL (except the first two pages of the file);
Drawing 74820-SHJ-A710-M1 CONFIDENTIAL;
Drawing 74820-SHJ-A710-M1 CONFIDENTIAL;
050217 Stabilus Report 1 from US CONFIDENTIAL;
050614 Stabilus Report 2 from GE CONFIDENTIAL;
050622 Stabilus Report 3 from GE CONFIDENTIAL;
050624 Stabilus Report 4 from GE CONFIDENTIAL;
050722 Stabilus Report 5 from GE CONFIDENTIAL;
050723 Stabilus Report 6 from GE CONFIDENTIAL;
051222 Stabilus Report 7 from GE CONFIDENTIAL;
060106 Stabilus Report 8 from GE CONFIDENTIAL;
060113 Stabilus Report 9 from GE CONFIDENTIAL; and
080710 Stabilus Report 10 from US CONFIDENTIAL;