



GENERAL MOTORS LLC
Global Interior and Safety Center

October 30, 2009

2009 OCT -3 3 23

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

PE08-056

N080326

RE: Request for reconsideration of Confidentiality Determination PE08-056

Dear Mr. Vincent:

This is in response to Mr. Otto Matheke's letter received by General Motors on October 15, 2009 that denies Delphi Corporation's (Delphi) request for confidential treatment of certain documents. These documents were submitted as part of Att_3_Delphi_CONF disk in response to a September 30, 2008 agency information request PE08-056.

GM is providing the letter from Delphi requesting reconsideration for confidential treatment in regards to 11 documents. A table that describes each document along with the harmful effects of public disclosure is attached to the Delphi letter which is located in the attached disk labeled Att_3_Delphi_CONF.

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

Sincerely,

Dale A. Furney
Engineering Group Manager
Product Investigations

Attachment





GENERAL MOTORS LLC
Global Interior and Safety Center

October 30, 2009

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

PE08-056

N080326

RE: Request for reconsideration of Confidentiality Determination PE08-056

Dear Mr. Vincent:

This is in response to Mr. Otto Matheke's letter received by General Motors on October 15, 2009 that denies Delphi Corporation's (Delphi) request for confidential treatment of certain documents. These documents were submitted as part of Att_3_Delphi_CONF disk in response to a September 30, 2008 agency information request PE08-056.

GM is providing the letter from Delphi requesting reconsideration for confidential treatment in regards to 11 documents. A table that describes each document along with the harmful effects of public disclosure is attached to the Delphi letter which is located in the attached disk labeled Att_3_Delphi_CONF.

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

Sincerely,

Dale A. Furney
Engineering Group Manager
Product Investigations

Attachment



October 26, 2009

O. Kevin Vincent
Chief Counsel
National Highway and Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

In RE: Delphi Petition for Reconsideration on Confidential Treatment regarding PE08-056 Documents

Dear Mr. Vincent:

Delphi requests reconsideration for confidential treatment in regards to 11 documents. A table that describes each document along with the harmful effects of public disclosure is attached. The documents identified in this request are similar in nature to past Delphi documents that have been granted confidential treatment.

Per section 512.8, the required supporting information is listed below.

A. Description of Confidential Information

Descriptions are provided in the attached table.

B. Confidentiality Standard

This confidentiality request should be evaluated under confidentiality standard 512.15 (b) (i.e. substantial harm to competitive position).

C. Harmful Effects of Disclosure

Please refer to the attached table.

D. Class Determination

None of the items fall within the class determinations specified in Appendix B of Part 512.

E. Time Period for Confidentiality

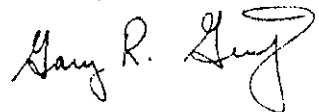
Delphi requests that the submitted confidential material be held confidential indefinitely.

F. Delphi Contact

Please direct all responses and inquiries to the undersigned.

Letter to O. Kevin Vincent
October 26, 2009
Page 2 of 4

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary R. Greib".

Gary R. Greib
Manager, Product Investigations and Safety Affairs
Delphi Corporation
5725 Delphi Dr
Troy, MI 48098-2815
248-813-3362
gary.r.greib@delphi.com

Attachment

cc: James Derian, Esq.

CL09-003-002

Attachment

Confidential Documents

Document Description per 512.8 (a)	Delphi Document Number	Harmful Effect per 512.8 (c) (2)
Brake and Electronic Stability Control System:		
Brake System Design and Failure Mode Effects Analysis	CL08-016a	Competitors can utilize Delphi's design analyses without the expense of developing their own
Brake Control Module Diagnostic Specifications	CL08-016b	Competitors can utilize Delphi's design specifications without the expense of developing their own
Electronic Stability Control Overview	CL08-016c	Competitors can utilize Delphi's system design without the expense of developing their own
Description of Wheel Control Authority	CL08-016d	Competitors can utilize Delphi's system design without the expense of developing their own
Brake Control Test Documents	CL08-016e	Competitors can utilize Delphi's test methods and system calibration without the expense of developing their own
Brake Control Software Verification Reports	CL08-016k	Competitor can utilize Delphi's parameters and methods for verifying software without the expense of developing their own
Brake Control Module Process and Failure Mode Effects Analysis	CL08-016s	Competitors can utilize Delphi's process analyses without the expense of developing their own
Q_08_D_18Y75314 DTW Steering Summary (Steering Sensor Input Analysis)	Q_08_D_18Y75314 DTW Steering Summary (CL08-016r)	Competitors can utilize Delphi's analysis and lessons learned without the expense of developing their own
Steering Wheel Position Sensor (SAS):		
Validation Test Report	CL08-016n	Competitors can utilize Delphi's validation plans and methodology without the expense of developing their own
Red X Study to Reduce Warranty Costs	CL08-016f	Competitors can utilize Delphi's problem solving methodology and lessons learned without the expense of developing their own
Design Failure Mode and Effects Analysis	CL08-016o	Competitors can utilize Delphi's design analyses

		without the expense of developing their own
--	--	--