

Ford Motor Company

Automotive Safety Office
Environmental and Safety Engineering

February 24, 2009

Mr. Stephen P. Wood
Acting Chief Counsel
Office of the Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE/W41-322
Washington, D.C. 20590

Dear Mr. Wood:

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 24, 2009, response to the agency's January 5, 2009, inquiry, PE08-070, are attached. Also Attachment 1, for your reference, is a copy of the non-confidential portion of Ford's response to the Office of Defect Investigations (ODI) information request.

This letter provides support for Ford's claim of confidentiality in accordance with 49 CFR § 512.8. Ford requests confidential treatment for the documents included in Appendix F as the documents are not customarily released to the public by Ford and because the documents contain confidential business information, the disclosure and public dissemination of which would likely cause substantial competitive harm to Ford (as contemplated in 49 CFR § 512.15, and 5 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 2.

Ford documents of the types listed in Attachment 2 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 (Attachment 3), which is made pursuant to 49 CFR § 512.4(b).

Compact discs containing electronic copies of documents provided in Appendix F are labeled "CONFIDENTIAL" and documents contained in the electronic files, provided in PDF format, are marked either "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" or "CONFIDENTIAL BUSINESS INFORMATION" as appropriate, in the top margin, as part of this response. Ford notes that these PDF documents were created using Adobe Acrobat 6.0 Professional and must be printed by selecting "document and comments" or "document and



markups" in order to print the appropriate bracket markings. These documents contain commercial information and are exempt from disclosure pursuant to 49 CFR § 512.15, and 5 U.S.C. § 552(b)(4). The pages of the documents for which Ford requests confidential treatment are labeled as described previously.

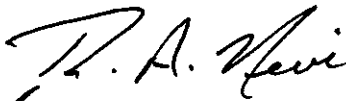
Some of the documents provided to the agency were generated by Hayes-Lemmerz, although in the possession of Ford, and certain of these documents are proprietary and confidential to Hayes-Lemmerz. It is the understanding of Ford that documents of the type in Appendix F are maintained by Hayes-Lemmerz under a record keeping system which is intended to control dissemination of this material as described in the attached Hayes-Lemmerz certification that is made pursuant to 49 CFR § 512.4(b) and § 512.9. Dissemination of this material would cause substantial competitive harm to Hayes-Lemmerz if not granted confidential status.

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 so 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. Jay Logel who may be contacted by telephone at (313) 594-3765.

Thank you for your continuing courtesy.

Sincerely,



James P. Vondale

Attachments