

**HONDA**

**American Honda Motor Co., Inc.**  
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U.S. DEPT. OF TRANSPORTATION  
NATIONAL HIGHWAY TRAFFIC SAFETY  
ADMINISTRATION

November 24, 2008

Office of the Chief Counsel  
U.S. DEPT. OF TRANSPORTATION  
National Highway Traffic Safety  
Administration  
1200 New Jersey Ave., SE  
Washington, DC 20590

**Re: RQ08-006 (2002-03 Honda Accord Ignition Interlock)  
Request for Confidentiality**

Dear Chief Counsel:

Enclosed herewith is a Request for Confidentiality submitted for your review and consideration.

Specifically, we are requesting confidentiality for the following documents in our response to Question 8: Document 1 (entire), Document 2 (QIS and QIC reports only), Document 3 (p. 2-4, 14-16, 36, 43), Document 4 (entire), Document 5 (p.2) and Document 6 (QIS and QIC reports). The attachments are proprietary data containing information regarding internal assessments and analyses, design and performance specifications, modification changes, associate names, VINS, engine numbers and transmission numbers. As such, the disclosure of this information would result in significant competitive damage to American Honda Motor Co., Inc. Therefore, we are requesting confidential treatment in accordance with the provisions of 5 U.S.C. 552(b)(4).

If you need any additional information regarding this matter, please let me know. We appreciate your consideration and look forward to your decision.

Very truly yours,

AMERICAN HONDA MOTOR CO., INC.



William R. Willen  
Managing Counsel  
Product Regulatory Office

WRW:nis

Enclosure

**AFFIDAVIT IN SUPPORT OF REQUEST  
OF CONFIDENTIALITY**

I, William R. Willen being duly sworn, depose and say:

- 1) That I am Managing Counsel of the Product Regulatory Office of the American Honda Motor Co., Inc., and that I am authorized by American Honda Motor Co., Inc., and Honda Motor Co., Ltd. (Honda), to make the following representations to the National Highway Traffic Safety Administration on behalf of Honda;
- 2) That information regarding Honda's development documents relating to the 2002-03 Honda Accord ignition interlock, as described in the attached submission 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 S505(d)(1) of Title 5 of the Motor Vehicle Information and Cost Savings Act). Honda is informed and believes that the disclosure of this information would result in significant competitive damage to the company;
- 3) That I have personally inquired of the responsible Honda employees 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 Honda;
- 4) That based upon the responses to such inquiries, to the best of my knowledge and belief, the information for which Honda has claimed confidential treatment has not been, and is not intended to be, released by Honda, to any person, organization or government agency or body outside Honda, its subsidiaries, affiliates, or contracted vendors;
- 5) Based on information and belief, none of the information in the attached materials has been released outside of the governmental entities to which they were supplied;
- 6) That I make no representations beyond those contained in this affidavit and in particular I make no representations as to whether this information may have become available outside of Honda and its subsidiaries, because of unauthorized or inadvertent disclosure except as stated in Paragraph 5;
- 7) That the information contained in the enumerated paragraphs of this affidavit is true and accurate to the best of my information, knowledge and belief.



William R. Willen

Subscribed and sworn to before me on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ by William R. Willen, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

\_\_\_\_\_  
NOTARY PUBLIC

**California Jurat**

**State of California**

County of Los Angeles } ss.

Subscribed and sworn to (~~or affirmed~~) before me on 24th day of Nov  
Month

2008, by William R. Willen and  
Year Name of Signer

\_\_\_\_\_, proved to me on the basis  
Name of Signer (if any)

of satisfactory evidence to be the person (s) who appeared before me.



(seal)

Lauren Ansley  
Signature of Notary Public

(Optional) My commission expires on.: 1/16/09

(Optional) Phone No.: \_\_\_\_\_