



September 18, 2009

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

N090152 Supplement 1

NVS-212.jfl
PE09-028

Dear Mr. Vincent:

Enclosed with this letter are two copies of General Motors' (GM) MRA analysis reports and warranty analysis information responsive to the NHTSA Office of Defects Investigation, regarding allegations of gasoline leaking from the fuel pump in 2002 model year (MY) Saturn L Series vehicles. This information is supplemental to the response sent August 7, 2009, to the NHTSA information request (IR) PE09-02, dated March 5, 2009. GM is submitting this information voluntarily to Vehicle Control Division Chief, Scott Yon.

GM requests the documents stamped "GM Confidential" be afforded confidential treatment without a time limitation by the NHTSA. These are included in the electronic disk identified as ATT_1_GM_CONF_Suppl 1. This information is a voluntary submission to the agency and is not customarily made public by GM, and 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). GM submits that the competitive harm would be substantial because the design and manufacture of vehicles and vehicle components are the core of its business, and because global competition in that business is intense.

The following identifies the specific type of confidential information contained in the documents:

DOCUMENT LOCATION	INFORMATION TYPES
Att_1_GM_Conf_Suppl 1\MRA Analysis	GM's summary and analysis reports of MRA field return parts
Att_1_GM_Conf_Suppl 1\Warranty Analysis	GM's Weibull analysis using regular warranty and extended service claims.

Product Investigations

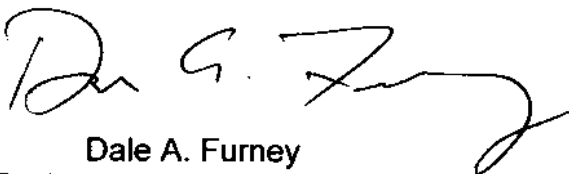
Mail Code: 480-210-G11 • 30001 Van Dyke Road • Warren, MI 48090
PE09-028_N090152 Supplement 1 Confidentiality Request.docx

GM treats the above material as confidential proprietary information available only to authorized GM, supplier, and customer personnel who have a business need for them, and are not otherwise available to the public. These documents are maintained under a record-keeping system that is intended to control dissemination of this material within GM and supplier and customer personnel, and to assure that it is not freely disseminated outside the Corporation. Multiple security systems are used to limit access to facilities and record storage systems where confidential information is stored, and employees receive training in information security policies and procedures.

To the best of our knowledge, the NHTSA, other Federal Agencies, or the Federal Courts has made no prior determinations of the confidentiality for these documents. These types of documents, however, have normally been granted confidential treatment by the NHTSA in the past, to the best of our knowledge.

The documents subject to this request for confidentiality is being provided and has been clearly stamped "GM Confidential Business Information" on the disk label. If a request for disclosure of any or all of this information is received by the NHTSA, GM requests notification of receipt of each such request and, if necessary, an opportunity to further explain the reasons why such material is trade secret and commercial information which should not be disclosed under the applicable statutes and regulations.

Please contact me if you require further information about this request.



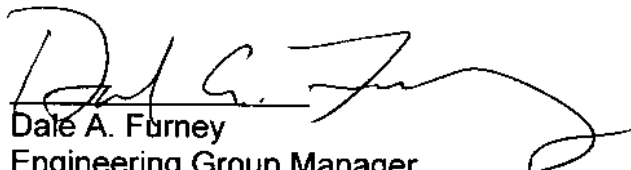
Dale A. Furney
Engineering Group Manager
Product Investigations

Enclosures

CERTIFICATE IN SUPPORT OF
REQUEST
FOR CONFIDENTIALITY

I, Dale A. Furney, pursuant to the provisions of 49 CFR Part 512, state as follows:

- (1) I am Engineering Group Manager of Product Investigations of General Motors Company and am authorized to execute this certificate on its behalf.
- (2) I certify that the information contained in the documents identified in the letter dated September 18, 2009 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 GM 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 GM has claimed confidential treatment has never been released or made available outside GM and supplier or customer personnel.
- (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 GM because of unauthorized or inadvertent disclosure.
- (7) I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 18th day of September 2009.


Dale A. Furney
Engineering Group Manager
Product Investigations