



GENERAL MOTORS LLC
Global Interior and Safety Center

March 11, 2010

NHTSA
WASHINGTON, DC 20590
2010 MAR 15 P 4: 05

OFFICE OF CHIEF
COUNSEL Door Handle Presentation

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

Dear Mr. Vincent:

Enclosed with this letter is a copy of a door handle presentation for the 2007 and 2008 Chevrolet Tahoe and GMC Yukon. GM is submitting this information voluntarily at the request of D. Scott Yon, NHTSA Chief – Vehicle Integrity Division.

Based on my March 3, 2010, conversation with Senior Attorney Mr. Otto G. Matheke III, going forward, GM will no longer treat submissions that include presentations to management, Field Performance Evaluation reports and other document types such as Investigation Summary Reports, as a unique assembly of information which has not been shared publicly. Instead, GM will review each document on a page by page basis when requesting confidential treatment.

GM requests the document stamped "GM Confidential Business Information" be afforded confidential treatment without a time limitation by the NHTSA. This is included in the electronic disk identified as ATT_2_GM_CONF. This information is a voluntary submission to the agency and is not customarily made public by GM, and contains 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 document:

| DOCUMENT NAME | INFORMATION TYPES |
|-----------------------------------|-------------------------------------|
| Door Handle Presentation, page 13 | GM's survival analysis methodology. |

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, 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.

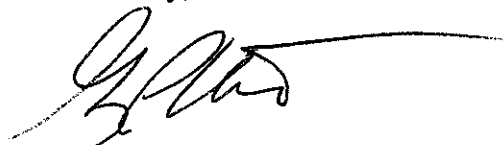
The confidential information contained in the Door Handle Presentation on page 13, discloses GM Engineering's vehicle and component evaluation and analysis methodology including charting of specific data for analysis purposes. Knowledge of how GM evaluates and analyzes component and vehicle performance would give a competitor valuable information that it would otherwise have to spend its time and money to develop, and therefore, would deprive GM of the competitive advantage of its efforts without any compensation. The application of the analysis and evaluation methodology information would give competitors insight into the design and performance of GMs products without having to expend their own resources or compensate GM for the knowledge they would gain. 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.

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

The document 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 commercial information which should not be disclosed under the applicable statutes and regulations.

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

Sincerely,



Gay P. Kent
Director, Product Investigations
and Safety Regulations

Enclosures

CERTIFICATE IN SUPPORT OF
REQUEST
FOR CONFIDENTIALITY

I, Gay P. Kent, pursuant to the provisions of 49 CFR Part 512, state as follows:

- (1) I am Director, Product Investigations and Safety Regulations of General Motors LLC 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 March 11, 2010 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 the 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 11th day of March 2010.



Gay P. Kent
Director, Product Investigations
and Safety Regulations