



NHTSA
WASHINGTON, DC 20590

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OFFICE OF CHIEF
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August 6, 2010

Mr. Oakley Kevin Vincent
Chief Counsel
Office of the Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE, Room W41-322
Washington, DC 20590

Subject: Request Under 49 CFR Part 512 for Confidential Treatment of Documents
Submitted in Response to Email Information Requests Dated July 19, 2010 and
July 28, 2010 Concerning EA10-001.

Dear Mr. Vincent:

This letter requests and provides support for Ford's claim of confidentiality in accordance with 49 CFR § 512.8 for certain documents submitted in response to two email information requests related to EA10-001. Two copies of confidential information referenced, but not included, in the Ford Motor Company (Ford) August 6, 2010, email response to the agency's July 19, 2010, and July 28, 2010 information requests are attached. Also, Attachment 1, for your reference, is a copy of the non-confidential portion of Ford's response to the ODI's information request.

Ford requests confidential treatment for the documents included in Appendices A, B, and C because the documents are not customarily released to the public by Ford and because the documents contain confidential business information, the disclosure 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)).

The confidential documents in Appendices A and B contain results of engineering testing conducted by Ford and could be used by competitors to determine Ford's strategies for certain safety devices and to then improve their own products and process without the need to invest the substantial resources invested by Ford. Confidential documents in Appendix C contain engineering specifications used by Ford and its suppliers to produce or evaluate parts during the design and development of its vehicles. Information concerning Ford's engineering design process could be used by competitors to ascertain Ford's strategies and technology requirements for certain safety devices and to develop or improve their own products and processes with the need to invest the substantial resources invested by Ford.

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

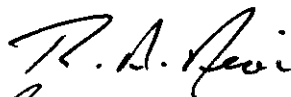
Documents provided in Appendices A, B, and C are labeled "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" as part of this response.

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 in order that Ford may pursue such legal remedies as it may choose. Please direct all written notices to me at Ford Motor Company, Suite 400, Fairlane Plaza South, 330 Town Center Drive, Dearborn, Michigan 48126. Please direct all non-written communication to Mr. Alan Prescott, who may be contacted by telephone at (313) 390-5621.

Thank you for your continuing courtesy.

Sincerely,



James P. Vondale

Attachments