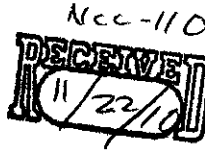




James P. Vondale, Director
Automotive Safety Office
Environmental & Safety Engineering



Fairlane Plaza South
330 Town Center Drive
Dearborn, MI 48126-2738 USA

November 19, 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

Dear Mr. Vincent:

Subject: Request Under 49 CFR Part 512 for Confidential Treatment of Information
Regarding October 15, 2010 Email Information Request for EA10-001

This letter requests confidential treatment and supports Ford's claim of confidentiality for confidential business information in accordance with 49 CFR § 512.8 and 5 U.S.C. § 552(b)(4).

Two copies of confidential information referenced in the Ford Motor Company (Ford) November 19, 2010, response to the agency's October 15, 2010, email are attached. Also for your reference, Attachment 1 is a copy of the non-confidential portion of Ford's response to the ODI's information request.

Ford requests protection from public disclosure for the documents because the documents contain confidential business information within the meaning of 49 C.F.R. § 512.3 and 512.15, and meet the following requirements:

1. The documents contain information that is not customarily released to the public by Ford.
2. Competitive Harm Test (established in *National Parks & Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974), and its progeny, and set for in 49 CFR § 512.15(b)): The documents contain confidential business information, the public disclosure of which would likely cause substantial competitive harm to Autoliv ASP, Inc., Ford's supplier, as further explained below.

Ford's responses to Requests 9 and 10 are provided in Appendix A and contain information concerning restraint control module diagnostic software developed by Autoliv ASP, Inc. The information provided could be used by competitors to develop or improve their own products



and processes without the need to invest the substantial resources invested by Autoliv ASP, Inc.

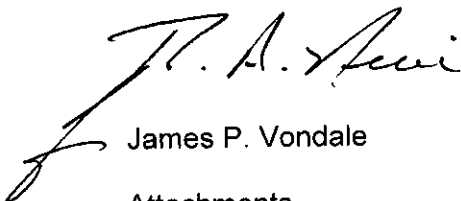
Documents of the types stated are maintained under a record keeping system which is intended to control dissemination of this material within Ford and Autoliv ASP, and to assure that the material is not disseminated outside of Ford and Autoliv ASP, except as described in the attached supplier certification (Attachment 2), which is made pursuant to 49 CFR § 512.4(b).

The top margin of Appendix A is marked "CONFIDENTIAL BUSINESS INFORMATION" as appropriate, as part of this response. Ford and Autoliv ASP request that this document be granted confidential treatment by the agency for a period of ten years. Earlier disclosure of this document, in Ford's and Autoliv ASP'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 and Autoliv ASP may pursue such legal remedies as they 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,

A handwritten signature in cursive script, appearing to read "J. P. Vondale".

James P. Vondale

Attachments