

OCT - 6 2011

Dennis E. Bunday
Executive Vice President
Chief Financial Officer
Williams Controls, Inc.
14100 SW 72nd Avenue
Portland, OR 97224

Re: Request for Confidential Treatment / EQ11-003

Dear Mr. Bunday:

This letter follows up on my letter dated September 7, 2011 responding to your June 9, 2011 request for confidential treatment for Williams Controls, Inc. (Williams) information submitted to the National Highway Traffic Safety Administration (NHTSA) in the above-referenced investigation. Williams requested confidentiality for information regarding the identity of its customers and associated customer information, and asserted that the public disclosure of this information would provide a significant competitive advantage to its competitors.

On April 26, 2011, Pierce Manufacturing, Inc. (Pierce) notified NHTSA that it had decided that certain Pierce fire trucks contained a safety-related defect related to an accelerator pedal manufactured by Williams. On May 12, 2011, NHTSA sent Williams an information request (IR) asking Williams to provide a list of customers who purchased the same or similar pedals. Williams, in its June 9, 2011 response to the IR, stated that Pierce had modified the pedal before installing it in its vehicles, and further stated that “[b]ecause the pedal assemblies involved in Recall 11V-255 comprise a modification by Pierce of the product originally sold to Pierce by Williams, we know of no same or similar pedal assemblies being used by other manufacturers.”

In my September 7, 2011 letter, I granted, in part, Williams’ request for confidential treatment. I noted that limited release of individual original equipment manufacturer names may be required to effectuate completion of the recall and remedy campaigns involving your product. Language in that letter could be construed as declaring that either NHTSA or Williams had determined that a safety defect existed in the Williams pedal.

Neither Williams nor NHTSA has made any determination that the pedal, as manufactured by Williams, contains a defect.

Sincerely,

Original Signed By

Otto G. Matheke, III
Senior Attorney

[REDACTED]