

JUN 13 2012

Steven M. Kenner  
Automotive Safety Office  
Environmental & Safety Engineering  
Ford Motor Company  
330 Town Center Drive  
Dearborn, MI 48126-2738

Re: Request Under 49 CFR Part 512 for Confidential Treatment of Information  
Regarding PE11-033

Dear Mr. Kenner:

This responds to your November 7, 2011 request for confidential treatment for Ford Motor Company (Ford) information submitted in response to a September 27, 2011 information request from the National Highway Traffic Safety Administration regarding PE11-033. The information is contained on a CD rom entitled "PE11-033 CONFIDENTIAL BUSINESS INFORMATION Ford Motor Company Confidential Appendix H November 7, 2011." Ford requests confidential treatment for engineering design drawings and engineering design specifications for a period of ten years.

Your request is granted.

The information provided by Ford was requested pursuant to 49 USC § 30166, which authorizes the agency to conduct investigations and require manufacturers to submit reports. Because Ford was required to submit this information, I have examined your submission using the competitive harm standard set forth in *National Parks & Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974).

I have reviewed your submission, including the materials that you claim are entitled to confidential treatment and the arguments that you assert in support of your claim. I have concluded that the public release of engineering design drawings and engineering design specifications would be likely to cause substantial competitive harm to your company and, therefore, that this information is entitled to confidential treatment pursuant to Exemption 4 of the Freedom of Information Act, 5 USC § 552(b)(4).

This grant of confidential treatment is subject to certain conditions. The information may be disclosed under 49 CFR § 512.22 based upon newly discovered or changed facts, and you must inform the agency of any changed circumstances that may affect the protection of the information (49 CFR § 512.10). If necessary, you will be notified prior to the release of any information under the procedures established by our regulations (49 CFR § 512.22(b)).

Sincerely,

**Original Signed By**

Otto G. Matheke, III  
Senior Attorney

