

2012 DEC 17 P 12:40

OFFICE OF CHIEF
COUNSELReg Modlin
Director
Regulatory Affairs

December 13, 2012

Mr. O. Kevin Vincent
Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Ave., SE, Room W41-227
Washington, DC 20590

Re: Request for Confidential Treatment of Business Information Submitted in EA12-005

Dear Mr. Vincent:

Chrysler Group LLC ("Chrysler") is submitting information to the NHTSA Office of Defects Investigation (ODI) in connection with the above referenced investigation. Based on a careful review of the submission, Chrysler Group has determined that some of the information is confidential and should be accorded confidential treatment under this agency's regulations at 49 C.F.R. Part 512 and Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4). Therefore, Chrysler Group is submitting the enclosed CDs together with this request for confidential treatment to the Office of Chief Counsel.¹

The information required by Part 512 is set forth below.

A. Description of the Information (49 C.F.R. § 512.8(a))

The business information for which confidential treatment is being sought is within the following enclosures.

- Enclosure 3 Conf Bus Info contains 69 pdf documents that contain Chrysler's internal guidelines, testing, and engineering standards. These documents include pages that are partially confidential (with the confidential information identified by yellow brackets, and the pages marked Confidential Business Information) and pages that are

¹ Chrysler Group has taken steps to assure that the CDs are free of any errors or defects that would prevent NHTSA from opening the files on the discs. If, however, the agency is unable to open the files, Chrysler Group respectfully requests that the agency inform Chrysler Group of the issue, so that Chrysler Group may take steps to supply NHTSA's Office of Chief Counsel with a disc that is fully functional.

entirely confidential (which are marked Entire Page Confidential Business Information).

- Enclosure 4 Subject Skid Plate Summary Conf. Bus Info contains seven pdf documents with engineering drawings. The pages of these documents are entirely confidential.
- Enclosure 6B - 301 Developmental Crash Tests Conf Bus Info contains developmental testing documents. These documents include pages that are partially confidential (with the confidential information identified by yellow brackets, and the pages marked Confidential Business Information) and pages that are entirely confidential (which are marked Entire Page Confidential Business Information).
- Enclosure 6C - Summary of 301 Crash Tests Conf Bus Info contains two documents with developmental testing information. The confidential business information in the document is highlighted in yellow and marked with black brackets.
- Enclosure 6J - Peer Fuel Tank Location Information Conf Bus Info contains one pdf document and is entirely confidential.
- Enclosure 7B Subject Component Design History Conf Bus Info contains the vehicle change history summary and is entirely confidential. .
- Enclosure 8B – Subject Vehicle Graphics Conf Bus Info contains 99 engineering graphics documents that are entirely confidential.

The tables attached to this letter identify the documents, their location, and Bates page numbers.

B. Confidentiality Standard (49 C.F.R. § 512.8(b))

This submission is subject to the substantial competitive harm standard set forth in 49 C.F.R. § 512.15(b) for information that a submitter is required to provide to the agency.

C. Justification for Confidential Treatment (49 C.F.R. § 512.8(c))

This agency's regulations and Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4), protect the confidentiality of information that would be likely to cause substantial competitive harm to the submitter if disclosed. *See e.g.* 49 C.F.R. § 512.15(b); *Nat'l Parks & Conservation Ass'n v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974). FOIA Exemption 4 was enacted to prevent disclosures that would "eliminate much of the time and effort that would otherwise be required to bring to market a product competitive with the [submitter's] product." *Public Citizen Health Research Grp. v. FDA*, 195 F.3d 898, 905 (D.C. Cir. 1999). "Because competition in business turns on the relative costs and opportunities faced by members of the same industry, there is a potential windfall for competitors to whom valuable information is released under FOIA. If those competitors are charged only minimal FOIA retrieval costs for the information, rather than the considerable costs of private reproduction, they may be getting quite a bargain. Such bargains could easily have competitive consequences not contemplated as part of FOIA's principal aim of

promoting openness in government.” *Worthington Compressors, Inc. v. Costle*, 662 F.2d 45, 51 (D.C. Cir. 1981). Substantial competitive harm also may result from disclosures that would reveal a firm’s “operational strengths and weaknesses” to competitors. *See Nat’l Parks & Conservation Ass’n v. Kleppe*, 547 F.2d 673, 684 (D.C. Cir. 1976). The information at issue here should be protected under these standards.

The internal guidelines for the fuel supply system design sets forth Chrysler’s internal performance standards and data analyses. These guidelines, which remain relevant to Chrysler’s design efforts, reveal the performance parameters that Chrysler sets for such components, which would provide competitively valuable insights into Chrysler design philosophies and expectations for the quality and performance of the relevant components. Armed with this information, competitors could compete more effectively against Chrysler in the sale of vehicles and in the aftermarket. Competitors also could use this information to determine the kinds of analyses that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler’s design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes.

The engineering standards in this submission could enable a competitor to develop, upgrade, and improve its own design decisions, and to gain insights into Chrysler’s operational capacities. Disclosure of these engineering standards would cause substantial competitive harm to Chrysler because competitors could use this information without incurring the costs normally required for independent development of such standards and procedures.

The engineering drawings and engineering graphics contain the detailed design specifics for various vehicle components. Competitors, including those in the aftermarket, could use this design information to improve their own designs without incurring the time and expense associated with independent design efforts. As a result, Chrysler Group’s competitors could bring to market their products much quicker and at less cost.

There is developmental testing information and developmental design studies and analysis in this submission. NHTSA has recognized that developmental testing information should be protected under Exemption 4. Such information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions. It bears emphasis that the testing at issue was *not* undertaken to assure or certify compliance with Federal Motor Vehicle Safety Standards, but rather was used by Chrysler in the design development and validation phases of vehicle development. The disclosure of this information would reveal the scope, nature, and timing of Chrysler’s developmental testing work—information that is critical to competitive vehicle manufacturing. Accordingly, the information should be protected from disclosure.

The test information in the submission also should be given confidential treatment. If this information is disclosed, competitors could determine the type of testing and reporting that Chrysler Group does in evaluating products, as well as Chrysler Group’s process of analysis,

product testing methodology, and problem solving capabilities. These documents reveal valuable information about the processes for remedying problems and evaluating and improving products. The disclosure of such information would enable competitors to refine their own product evaluation, remediation, and improvement procedures without incurring the costs normally required for independent development of such procedures, and also would provide information about Chrysler Group's operational strengths.

The failure mode effects and analysis documents would cause substantial competitive harm if disclosed because these documents set forth provisional assessments of potential risks associated with various failure modes. This information sets forth Chrysler's internal performance standards and data analyses. Competitors could determine the type of analyses that Chrysler does and compete more effectively without spending the time and resources to develop their own analyses.

A document relating to fuel tank location issues also should be protected. The document sets for factors and criteria that continue to be considered by Chrysler today and that, if disclosed, would provide competitors with a competitively valuable summary of the pertinent considerations for fuel tank location that remains useful to this day, and that would save them the time and effort that would be required for independent development of the insights contained in the document. Further, the document reveals valuable information into Chrysler's design philosophies, including how Chrysler weighs various factors in making design decisions. Especially when considered in conjunction with publicly available information about Chrysler's vehicles, the document therefore would provide competitively valuable information that would enable competitors to bring their own products more quickly and at less cost.

The change history summary would reveal competitively valuable information about the design and manufacturing process changes to the subject components, the timing of such changes, the reasons for the changes, and the process by which such changes were made. Thus, these documents reveal information about the design and manufacturing process, as well as Chrysler Group's lead-time and operational capacity information, which could enable competitors to improve their own designs and manufacturing processes, and compete more effectively against Chrysler Group. Furthermore, the disclosure of the reasons for various design changes could provide competitively valuable information about the underlying designs and about Chrysler Group's design philosophy.

D. Class Determination (49 C.F.R. § 512.8(d))

The engineering drawings and graphics fall within the class determination for "blueprints and engineering drawings." 49 C.F.R. Part 512, App. B(1).

E. Duration for Which Confidential Treatment is Sought (49 C.F.R. § 512.8(e))

Because Chrysler Group anticipates that the information will be competitively valuable indefinitely, Chrysler Group requests that the information be accorded confidential treatment permanently.

F. Contact Information (49 C.F.R. § 512.8(f))

Please direct all inquiries and responses to the undersigned at:

800 Chrysler Drive, CIMS 482-00-91
Auburn Hills, MI 48326
248-512-0087
dd28@chrysler.com

If you receive a request for disclosure of the information for which confidential treatment is being sought before you have completed your review of our request, Chrysler respectfully requests notification of the request(s) and an opportunity to provide further justification for the confidential treatment of this information, if warranted.

Sincerely,

A handwritten signature in black ink that reads "Reg Modlin". The signature is written in a cursive, flowing style.

Reg Modlin

cc: Frank Borris

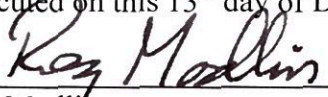
Attachment and Enclosures

Certificate in Support of Request for Confidentiality

I, Reg Modlin, pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

- (1) I am Chrysler Group LLC's Director, Regulatory Affairs and I am authorized by Chrysler Group LLC to execute documents on its behalf;
- (2) I certify that the information contained in the attached documents 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);
- (3) I hereby request that the information contained in the indicated documents be protected on a permanent basis;
- (4) This certification is based on the information provided by the responsible Chrysler Group LLC personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Chrysler Group LLC;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which Chrysler Group LLC has claimed confidential treatment has never been released or become available outside Chrysler Group LLC, except to certain contractors of Chrysler Group LLC with the understanding that such information must be maintained in strict confidence;
- (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 Chrysler Group LLC because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and
- (7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 13th day of December, 2012



Reg Modlin

**EA12-005 - Enclosure 3 - CONF BUS INFO
CONFIDENTIAL DOCUMENTS CHART**

SUB-FOLDER	FILE/DOCUMENT NAME	CBI BATES PAGE #	DOCUMENT DESCRIPTION	CONFIDENTIALITY JUSTIFICATION
Austin Lawsuit CONF BUS INFO	Austin-Banta Ex. 5 CBI.pdf	EA12-005 – Chrysler – 033320-33330	Internal Design Guidelines	The disclosure of this information could enable a competitor to determine the kinds of analyses that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler's design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes.
	Austin-Banta Ex. 6 CBI.pdf	EA12-005 – Chrysler – 033331-33332	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Banta Ex. 7 CBI.pdf	EA12-005 – Chrysler – 033333	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Banta Ex. 8 CBI.pdf	EA12-005 – Chrysler – 033335	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Banta Ex. 9 CBI.pdf	EA12-005 – Chrysler – 033337	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Banta Ex. 10 CBI.pdf	EA12-005 – Chrysler – 033339-33341	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.

Austin-Banta Ex. 11 CBI.pdf	EA12-005 – Chrysler – 033342-33343	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Austin-Banta Ex. 12 CBI.pdf	EA12-005 – Chrysler – 033345	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Austin-Banta Ex. 13 CBI.pdf	EA12-005 – Chrysler – 033347	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Austin-Banta Ex. 14 CBI.pdf	EA12-005 – Chrysler – 033349	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Austin-Banta Ex. 15 CBI.pdf	EA12-005 – Chrysler – 033351	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Austin-Banta Ex. 16 CBI.pdf	EA12-005 – Chrysler – 033353	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Austin-Banta Ex. 17 CBI.pdf	EA12-005 – Chrysler – 033355	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Austin-Banta Ex. 18 CBI.pdf	EA12-005 – Chrysler – 033359	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Austin-Banta Ex. 19 CBI.pdf	EA12-005 – Chrysler – 033361	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.

	Austin-Banta Ex. 20 CBI.pdf	EA12-005 – Chrysler – 033363	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Banta Ex. 21 CBI.pdf	EA12-005 – Chrysler – 033365	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Banta Ex. 22 CBI.pdf	EA12-005 – Chrysler – 033367	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Estes Ex. 1 CBI.pdf	EA12-005 – Chrysler – 033369-33384	Internal Design Guidelines	The disclosure of this information could enable a competitor to determine the kinds of analyses that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler's design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes.
	Austin-Estes Ex. 2 CBI.pdf	EA12-005 – Chrysler – 033385-33393	Internal Design Guidelines	The disclosure of this information could enable a competitor to determine the kinds of analyses that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler's design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes.
	Austin-Estes Ex. 5 CBI.pdf	EA12-005 – Chrysler – 033394-33395	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.

	Austin-Estes Ex. 6 CBI.pdf	EA12-005 – Chrysler – 033400, 33401, 33404	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Estes Ex. 7 CBI.pdf	EA12-005 – Chrysler – 033405, 33407, 33409, 33415	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Estes Ex. 10 CBI.pdf	EA12-005 – Chrysler – 033425, 33428, 33429, 33434	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Estes Ex. 11 CBI.pdf	EA12-005 – Chrysler – 033436, 33439, 33440	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Estes Ex. 12 CBI.pdf	EA12-005 – Chrysler – 033443, 33445, 33448, 33451	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Estes Ex. 13 CBI.pdf	EA12-005 – Chrysler – 033454, 33457, 33460, 33461, 33464, 33469, 33504	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Estes Ex. 14 CBI.pdf	EA12-005 – Chrysler – 033513, 33515, 33522	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Estes Ex. 15 CBI.pdf	EA12-005 – Chrysler – 033552, 33554, 33564, 33602	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Austin-Estes Ex. 16 CBI.pdf	EA12-005 – Chrysler – 033623, 33625, 33634	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.

Austin-Estes Ex. 17 CBI.pdf	EA12-005 – Chrysler – 033560, 33562, 33663, 33730, 33737	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Austin-Estes Ex. 18 CBI.pdf	EA12-005 – Chrysler – 033778, 33780, 33783, 33787	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Austin-Estes Ex. 19 CBI.pdf	EA12-005 – Chrysler – 033791, 33793, 33803, 33833	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Austin-Estes Ex. 20 CBI.pdf	EA12-005 – Chrysler – 033850, 33852, 33861	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Austin-Lazarus Ex. 8 CBI.pdf	EA12-005 – Chrysler – 033941- 33949	Internal Design Guidelines	The disclosure of this information could enable a competitor to determine the kinds of analyses that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler's design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes.
Austin-Lazarus Ex. 10 CBI.pdf	EA12-005 – Chrysler – 033950-33965	Internal Design Guidelines	The disclosure of this information could enable a competitor to determine the kinds of analyses that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler's design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes.

Jarmon Lawsuit CONFIDENTIAL INFO	Jarmon-Banta Ex. 3 CBI.pdf	EA12-005 – Chrysler – 033966-33976	Internal Design Guidelines	The disclosure of this information could enable a competitor to determine the kinds of analyses that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler's design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes.
	Jarmon-Banta Ex. 4 CBI.pdf	EA12-005 – Chrysler – 033977- 33987	Internal Design Guidelines	The disclosure of this information could enable a competitor to determine the kinds of analyses that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler's design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes.
	Jarmon-Banta Ex. 5 CBI.pdf	EA12-005 – Chrysler – 033988- 34006	Internal Design Guidelines	The disclosure of this information could enable a competitor to determine the kinds of analyses that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler's design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes.
	Jarmon-Banta Ex. 7 CBI.pdf	EA12-005 – Chrysler – 034007-34019	Engineering Standards	The disclosure of this information could enable a competitor to develop, upgrade, and improve its own design decisions, and to gain insights into Chrysler's operational capacities.

Jarmon-Zylik Ex. 1 CBI.pdf	EA12-005 – Chrysler – 034020-34030	Internal Design Guidelines	The disclosure of this information could enable a competitor to determine the kinds of analyses that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler’s design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes.
Jarmon-Zylik Ex. 2 CBI.pdf	EA12-005 – Chrysler – 034032, 34034	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Jarmon-Zylik Ex. 3 CBI.pdf	EA12-005 – Chrysler – 034039, 34041, 34042, 34043	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Jarmon-Zylik Ex. 5 CBI.pdf	EA12-005 – Chrysler – 034048, 34052	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Jarmon-Zylik Ex. 6 CBI.pdf	EA12-005 – Chrysler – 034054, 034057	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Jarmon-Zylik Ex. 7 CBI.pdf	EA12-005 – Chrysler – 034064, 34067, 34068	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Jarmon-Zylik Ex. 8 CBI.pdf	EA12-005 – Chrysler – 034077	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Jarmon-Zylik Ex. 9 CBI.pdf	EA12-005 – Chrysler – 034080, 34082	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.

Jarmon-Zylik Ex. 10 CBI.pdf	EA12-005 – Chrysler – 034084	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Jarmon-Zylik Ex. 13 CBI.pdf	EA12-005 – Chrysler – 034086, 34088	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Jarmon-Zylik Ex. 14 CBI.pdf	EA12-005 – Chrysler – 034093, 34095, 34096	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Jarmon-Zylik Ex. 15 CBI.pdf	EA12-005 – Chrysler – 034100, 34103, 34104	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Jarmon-Zylik Ex. 16 CBI.pdf	EA12-005 – Chrysler – 034107, 34109, 34112, 34113, 34114	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Jarmon-Zylik Ex. 17 CBI.pdf	EA12-005 – Chrysler – 034117, 34119, 34123	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Jarmon-Zylik Ex. 18 CBI.pdf	EA12-005 – Chrysler – 034126, 34128, 34132	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Jarmon-Zylik Ex. 19 CBI.pdf	EA12-005 – Chrysler – 034135, 34137, 34139, 34141	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
Jarmon-Zylik Ex. 20 CBI.pdf	EA12-005 – Chrysler – 034143-34155	Engineering Standards	The disclosure of this information could enable a competitor to develop, upgrade, and improve its own design decisions, and to gain insights into Chrysler's operational capacities.

the Lawsuit CONF BUS INFO	Kline-Castaing Ex. 8 CBI.pdf	EA12-005 – Chrysler – 034156-34166	Internal Design Guidelines	The disclosure of this information could enable a competitor to determine the kinds of analyses that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler's design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes.
	Kline-Castaing Ex. 9 CBI.pdf	EA12-005 – Chrysler – 034167-34182	Internal Design Guidelines	The disclosure of this information could enable a competitor to determine the kinds of analyses that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler's design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes.
	Kline-Castaing Ex.17 CBI.pdf	EA12-005 – Chrysler – 034183, 34186, 34188	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Kline-Castaing Ex. 18 CBI.pdf	EA12-005 – Chrysler – 034190, 34192, 34194, 34195	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Kline-Castaing Ex. 19 CBI.pdf	EA12-005 – Chrysler – 034197	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Kline-Castaing Ex. 20 CBI.pdf	EA12-005 – Chrysler – 034199, 34201	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.

	Kline-Castaing Ex. 21 CBI.pdf	EA12-005 – Chrysler – 034205, 34207	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Kline-Castaing Ex. 22 CBI.pdf	EA12-005 – Chrysler – 034211, 34213	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Kline-Dillon Ex. 9 CBI.pdf	EA12-005 – Chrysler – 034218-34229	Internal Design Guidelines	The disclosure of this information could enable a competitor to determine the kinds of analyses that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler’s design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes.
	Kline-Dillon Ex. 10 CBI.pdf	EA12-005 – Chrysler – 034230-34250	Internal Design Guidelines	The disclosure of this information could enable a competitor to determine the kinds of analyses that Chrysler performs in the design process, allowing them to benchmark and replicate Chrysler’s design procedures without incurring the substantial time and cost associated with independent development of such parameters and processes.
	Kline-Zylik Ex. 9 CBI.pdf	EA12-005 – Chrysler – 034251, 34253	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	Kline-Zylik Ex. 12 CBI.pdf	EA12-005 – Chrysler – 034258, 34260	Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.

EA12-005 - Enclosure 4 Subject Skid Plate Summary Conf Bus Info
CONFIDENTIAL DOCUMENTS CHART

FILE/DOCUMENT NAME	BATES PAGE #	DOCUMENT DESCRIPTION	CONFIDENTIALITY JUSTIFICATION
52001512_____C_SKID_ PLATE_ASSY_- _FUEL_TANK_ CBI.pdf	EA12-005 – Chrysler - 000126	Engineering Drawings	Competitors could determine the design specifics of the subject component and improve their own designs to compete more effectively against Chrysler.
52001512C_SKID_PLATE_ ASSY_-_FUEL_TANK_ CBI.pdf	EA12-005 – Chrysler – 000127 - 129		
52100328AA+++++C±SKID ±PLATE±ASSY±- ±FUEL±TANK CBI.PDF	EA12-005 – Chrysler – 000130 - 133		
52100332AC-C Comment Page CBI.pdf	EA12-005 – Chrysler – 000134 - 135		
52100332AF+++++B±SKID ±PLATE±ASSY±- +FUEL±TANK CBI.pdf	EA12-005 – Chrysler – 000136 - 138		
52100332AG+++++A±SKID ±PLATE±ASSY±- ±FUEL±TANK CBI.pdf	EA12-005 – Chrysler – 000139 - 141		
52100332AH+++++A±SKID ±PLATE±ASSY±- ±FUEL±TANK CBI.pdf	EA12-005 – Chrysler – 000123 - 125		

EA12-005 - Enclosure 6B-301 Developmental Crash Tests Conf Bus Info
CONFIDENTIAL DOCUMENTS CHART

BODY STYLE FOLDER	VC TEST FOLDER	FILE/DOCUME NT NAME	BATES PAGE #	DOCUMENT DESCRIPTIO N	CONFIDENTIALITY JUSTIFICATION
XJ Developmental VC TESTS CONF BUS Info	3597 CONF BUS INFO	vc-3597_01 CBI.pdf	EA12-005 – Chrysler - 000146,148, 154,158	Vehicle Developmental Testing Documents	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	3790 CONF BUS INFO	vc-3790 CBI.pdf	EA12-005 – Chrysler - 000217, 219, 221, 230, 244, 251, 295, 321		
	3860 CONF BUS INFO	vc-3860 CBI.pdf	EA12-005 – Chrysler - 000403, 406, 443, 478, 479		
	3918 CONF BUS INFO	vc-3918 CBI.pdf	EA12-005 – Chrysler - 000496, 499, 510, 526, 540, 548, 549		
	3960 CONF BUS INFO	vc-3960 CBI.pdf	EA12-005 – Chrysler - 000572, 575, 605, 638, 639		
	5211 CONF BUS INFO	VC005211 CBI.pdf	EA12-005 – Chrysler - 000646, 650, 656, 660, 665		
	5241 CONF BUS INFO	vc-05241 CBI.pdf	EA12-005 – Chrysler - 000701, 706, 712, 713, 721		
	5282 CONF BUS INFO	vc-5282 CBI.pdf	EA12-005 – Chrysler - 000772, 783		

XJ Developmental VC TESTS CONF BUS Info (cont.)	5309 CONF BUS INFO	vc-5309_01 CBI.pdf	EA12-005 – Chrysler - 000819, 821, 828	Vehicle Developmental Testing Documents	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	5383 CONF BUS INFO	vc-5383_01 CBI.pdf	EA12-005 – Chrysler - 000867, 869, 876		
	5682 CONF BUS INFO	vc-5682_01 CBI.pdf	EA12-005 – Chrysler - 000919, 921, 932		
	6062 CONF BUS INFO	vc-6062_02 CBI.pdf	EA12-005 – Chrysler - 001003, 1006, 1016, 1067		
	6146 CONF BUS INFO	vc-6146_01 CBI.pdf	EA12-005 – Chrysler - 001092, 1094, 1104, 1144		
	AM1458 CONF BUS INFO	AM 1458 CBI.PDF	EA12-005 – Chrysler - 001164, 1166, 1183		
	AM1522 CONF BUS INFO	AM 1522 photos CBI.PDF	EA12-005 – Chrysler - 001186, 1189, 1188		
	AM1533 CONF BUS INFO	AM 1533 photos CBI.PDF	EA12-005 – Chrysler - 001204, 1206, 1221		
	AM1540 CONF BUS INFO	AM 1540 CBI.PDF	EA12-005 – Chrysler - 001223, 1225		
	AM1573 CONF BUS INFO	AM 1573-1 CBI.PDF	EA12-005 – Chrysler - 001241, 1244, 1257		
	AM1581 CONF BUS INFO	AM 1581 CBI.PDF	EA12-005 – Chrysler - 001259, 1261, 1274		

XJ Developmental VC TESTS CONF BUS Info (cont.)	AM1584 CONF BUS INFO	AM 1584 CBI.PDF	EA12-005 – Chrysler - 001276, 1278, 1291	Vehicle Developmental Testing Documents	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	AM1623 CONF BUS INFO	AM 1623 CBI.PDF	EA12-005 – Chrysler - 001293, 1295, 1308		
	AM1626 CONF BUS INFO	AM 1626 CBI.PDF	EA12-005 – Chrysler – 001309, 1311, 1313, 1326		
	AM1635 CONF BUS INFO	AM 1635 CBI.PDF	EA12-005 – Chrysler - 001329, 1331		
	AM1661 CONF BUS INFO	AM 1661 CBI.PDF	EA12-005 – Chrysler - 001345, 1347, 1360		
	AM1665 CONF BUS INFO	AM 1665 CBI.PDF	EA12-005 – Chrysler - 001362, 1364, 1377		
	AM1669 CONF BUS INFO	AM 1669 CBI.PDF	EA12-005 – Chrysler - 001379, 1382, 1395		
	AM1671 CONF BUS INFO	AM 1671 CBI.PDF	EA12-005 – Chrysler - 001397, 1399, 1411		
	AM1679 CONF BUS INFO	AM 1679 CBI.PDF	EA12-005 – Chrysler - 001413, 1415, 1428		
	AM1689 CONF BUS INFO	AM 1689 CBI.PDF	EA12-005 – Chrysler - 001430, 1432		
	AM1696 CONF BUS INFO	AM 1696 CBI.PDF	EA12-005 – Chrysler - 001445, 1447		

XJ Developmental VC TESTS CONF BUS Info (cont.)	AM1700 CONF BUS INFO	AM 1700 CBI.PDF	EA12-005 – Chrysler – 001461, 1463	Vehicle Developmental Testing Documents	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	AM1706 CONF BUS INFO	AM 1706 CBI.PDF	EA12-005 – Chrysler – 001476, 1478		
	AM1711 CONF BUS INFO	AM 1711 CBI.PDF	EA12-005 – Chrysler – 001496, 1497		
	AM1723 CONF BUS INFO	AM 1723 CBI.PDF	EA12-005 – Chrysler – 001511, 1512		
	AM1736 CONF BUS INFO	AM 1736 CBI.PDF	EA12-005 – Chrysler – 001526, 1527		
	AM1762 CONF BUS INFO	AM 1762 photos CBI.PDF	EA12-005 – Chrysler – 001553, 1554		
	AM1798 CONF BUS INFO	AM 1798 CBI.PDF	EA12-005 – Chrysler – 001571, 1572		
	AM1829 CONF BUS INFO	AM 1829 CBI.PDF	EA12-005 – Chrysler – 001586, 1587		
	AM1845 CONF BUS INFO	AM 1845 CBI.PDF	EA12-005 – Chrysler – 001601, 1602		
	AM1848 CONF BUS INFO	AM 1848 CBI.PDF	EA12-005 – Chrysler – 001618, 1619		
	AM1880 CONF BUS INFO	AM 1880 CBI.PDF	EA12-005 – Chrysler – 001635, 1636		
	AM1888 CONF BUS INFO	AM 1888 CBI.PDF	EA12-005 – Chrysler – 001648, 1652, 1653		
	AM1928 CONF BUS INFO	AM 1928 CBI.PDF	EA12-005 – Chrysler – 001665, 1669, 1671		

XJ Developmental VC TESTS CONF BUS Info (cont.)	AM1932 CONF BUS INFO	AM 1932 CBI.PDF	EA12-005 – Chrysler – 001684, 1688, 1689	Vehicle Developmental Testing Documents	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	AM2028 CONF BUS INFO	AM 2028 CBI.PDF	EA12-005 – Chrysler – 001702, 1707, 1708		
	AM2041 CONF BUS INFO	AM 2041 CBI.PDF	EA12-005 – Chrysler – 001721, 1726, 1727		
KJ Developmental VC TESTS CONF BUS INFO	VC07506 CONF BUS INFO	VC7506 CBI.pdf	EA12-005 – Chrysler - 001741, 1744, 1747, 1757, 1846, 1847, 1853, 1854	Vehicle Developmental Testing Documents	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	VC07623 CONF BUS INFO	VC7623 CBI.pdf	EA12-005 – Chrysler - 001895, 1898, 1901, 1912, 2012, 2013, 2021, 2022		
	VC07746 CONF BUS INFO	VC7746 CBI.pdf	EA12-005 – Chrysler - 002064, 2065, 2069, 2079, 2225, 2226, 2232, 2233		
	VC08023 CONF BUS INFO	VC8023 CBI.pdf	EA12-005 – Chrysler - 002267, 2271, 2275, 2287, 2393, 2394, 2401, 2402		
	VC08025 CONF BUS INFO	VC8025 CBI.pdf	EA12-005 – Chrysler - 002437, 2441, 2444, 2457, 2567, 2568, 2575, 2576		

KJ Developmental VC TESTS CONF BUS INFO (cont.)	VC08268 CONF BUS INFO	VC08268 CBI.pdf	EA12-005 – Chrysler - 002610, 2612, 2622	Vehicle Developmental Testing Documents	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	VC08459 CONF BUS INFO	VC08459 CBI.pdf	EA12-005 – Chrysler - 002704, 2706, 2718		
	VC08945 CONF BUS INFO	VC08945 CBI.pdf	EA12-005 – Chrysler - 002793, 2796, 2806		
	VC09026 CONF BUS INFO	VC09026 CBI.pdf	EA12-005 – Chrysler - 002876, 2878, 2881, 2882, 2885, 2893		
	VC09029 CONF BUS INFO	VC09029 CBI.pdf	EA12-005 – Chrysler - 002946, 2948, 2951, 2959		
	VC09089 CONF BUS INFO	VC9089 CBI.pdf	EA12-005 – Chrysler - 003011, 3013, 3017, 3024		
	VC09094 CONF BUS INFO	VC9094 CBI.pdf	EA12-005 – Chrysler - 003048, 3049		
	VC09559 CONF BUS INFO	VC09559 Report CBI.pdf	EA12-005 – Chrysler - 003062, 3066, 3079, 3124, 3125, 3131, 3132, 3138, 3139		
	VC09935 CONF BUS INFO	VC09935 CBI.pdf	EA12-005 – Chrysler - 003166, 3171, 3179		
	VC09935 CONF BUS INFO	VC09935.TVA.T VALUE CBI.PDF	EA12-005 – Chrysler - 003233		

KJ Developmental VC TESTS CONF BUS INFO (cont.)	VC10306 CONF BUS INFO	VC10306 CBI.pdf	EA12-005 – Chrysler - 003238, 3243	Vehicle Developmental Testing Documents	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	VC10306 CONF BUS INFO	VC10306.FAR.DC R.FA_REPORT.D CR_DYNAMIC_ CRUSH_REAR CBI.PDF	EA12-005 – Chrysler - 003256		
	VC10306 CONF BUS INFO	VC10306.FAR.UB R.FA_REPORT.U BR_UNDERBOD Y_REAR CBI.PDF	EA12-005 – Chrysler - 003282		
	VC10306 CONF BUS INFO	VC10306.TVA.T VALUE CBI.PDF	EA12-005 – Chrysler - 003284		
	VC10307 CONF BUS INFO	VC10307.TVA.T VALUE CBI.PDF	EA12-005 – Chrysler - 003334		
	VC10307 CONF BUS INFO	VC10307.FAR.UB R.FA_REPORT.U BR_UNDERBOD Y_REAR CBI.PDF	EA12-005 – Chrysler - 003325		
	VC10307 CONF BUS INFO	VC10307.FAR.DC R.FA_REPORT.D CR_DYNAMIC_ CRUSH_REAR CBI.PDF	EA12-005 – Chrysler - 003332		
	VC10307 CONF BUS INFO	VC10307 CBI.pdf	EA12-005 – Chrysler - 003289, 3294		
	VC10445 CONF BUS INFO	VC10445 CBI.pdf	EA12-005 – Chrysler - 003339, 3351		
	VC10445 CONF BUS INFO	VC10445.FAR.DC R.FA_REPORT.D CR_DYNAMIC_ CRUSH_REAR CBI.PDF	EA12-005 – Chrysler - 003387		

KJ Developmental VC TESTS CONF BUS INFO (cont.)	VC10445 CONF BUS INFO	VC10445.FAR.UB R.FA_REPORT.U BR_UNDERBOD Y_REAR CBI.PDF	EA12-005 – Chrysler - 003380	Vehicle Developmental Testing Documents	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	VC10445 CONF BUS INFO	VC10445.TVA.T VALUE CBI.PDF	EA12-005 – Chrysler - 003389		
	VC10499 CONF BUS INFO	VC10499.EDP.LE TTER CBI.PDF	EA12-005 – Chrysler - 003394		
	VC10499 CONF BUS INFO	VC10499.FAR.DC R.FA_REPORT.D CR_DYNAMIC_ CRUSH_REAR CBI.PDF	EA12-005 – Chrysler - 003441, 3442		
	VC10499 CONF BUS INFO	VC10499.FAR.UB R.FA_REPORT.U BR_UNDERBOD Y_REAR CBI.PDF	EA12-005 – Chrysler - 003433, 3434		
	VC10499 CONF BUS INFO	VC10499.LET.LE TTER CBI.PDF	EA12-005 – Chrysler - 003397		
	VC10499 CONF BUS INFO	VC10499.REQ.TE ST_REQUEST CBI.PDF	EA12-005 – Chrysler - 003402, 3403		
	VC10499 CONF BUS INFO	VC10499.TVA.T VALUE CBI.PDF	EA12-005 – Chrysler - 003345		
	VC10546 CONF BUS INFO	VC10546.EDP.LE TTER CBI.PDF	EA12-005 – Chrysler - 003450		
	VC10546 CONF BUS INFO	VC10546.LET.LE TTER CBI.PDF	EA12-005 – Chrysler - 003452		
	VC10546 CONF BUS INFO	VC10546.REQ.TE ST_REQUEST CBI.PDF	EA12-005 – Chrysler - 003456, 3457		
	VC10546 CONF BUS INFO	VC10546.TVA.T VALUE CBI.PDF	EA12-005 – Chrysler - 003461		

KJ Developmental VC TESTS CONF BUS INFO (cont.)	VC10771 CONF BUS INFO	VC10771.EDP.LE TTER CBI.PDF	EA12-005 – Chrysler - 003467	Vehicle Developmental Testing Documents	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	VC10771 CONF BUS INFO	VC10771.FAR.DC R.FA_REPORT.D CR_DYNAMIC_ CRUSH_REAR CBI.PDF	EA12-005 – Chrysler - 003480, 3481		
	VC10771 CONF BUS INFO	VC10771.FAR.UB R.FA_REPORT.U BR_UNDERBOD Y_REAR CBI.PDF	EA12-005 – Chrysler - 003505, 3506		
	VC10771 CONF BUS INFO	VC10771.LET.LE TTER CBI.PDF	EA12-005 – Chrysler - 003465		
	VC10771 CONF BUS INFO	VC10771.REQ.TE ST_REQUEST CBI.PDF	EA12-005 – Chrysler - 003471, 3472		
	VC10771 CONF BUS INFO	VC10771.TVA.T VALUE CBI.PDF	EA12-005 – Chrysler - 003508		
	VC11439 CONF BUS INFO	VC11439.EDP.LE TTER CBI.PDF	EA12-005 – Chrysler - 003513		
	VC11439 CONF BUS INFO	VC11439.FAR.DC R.FA_REPORT.D CR_DYNAMIC_ CRUSH_REAR CBI.PDF	EA12-005 – Chrysler - 003557		
	VC11439 CONF BUS INFO	VC11439.FAR.UB R.FA_REPORT.U BR_UNDERBOD Y_REAR CBI.PDF	EA12-005 – Chrysler - 003548		
	VC11439 CONF BUS INFO	VC11439.LET.LE TTER CBI.PDF	EA12-005 – Chrysler - 003511		
	VC11439 CONF BUS INFO	VC11439.REQ.TE ST_REQUEST CBI.PDF	EA12-005 – Chrysler - 003518		

KJ Developmental VC TESTS CONF BUS INFO (cont.)	VC11439 CONF BUS INFO	VC11439.TVA.T VALUE CBI.PDF	EA12-005 – Chrysler - 003559	Vehicle Developmental Testing Documents	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
	VC11444 CONF BUS INFO	VC11444.EDP.LE TTER CBI.PDF	EA12-005 – Chrysler - 003563		
	VC11444 CONF BUS INFO	VC11444.LET.LE TTER CBI.PDF	EA12-005 – Chrysler - 003565		
	VC11444 CONF BUS INFO	VC11444.REQ.TE ST_REQUEST CBI.PDF	EA12-005 – Chrysler - 003570		
	VC11444 CONF BUS INFO	VC11444.TVA.T VALUE CBI.PDF	EA12-005 – Chrysler - 003575		
	VC11711 CONF BUS INFO	VC11711.EDP.LE TTER CBI.PDF	EA12-005 – Chrysler - 003579		
	VC11711 CONF BUS INFO	VC11711.LET.LE TTER CBI.PDF	EA12-005 – Chrysler - 003581		
	VC11711 CONF BUS INFO	VC11711.TVA.T VALUE CBI.PDF	EA12-005 – Chrysler - 003583		
	VC11790 CONF BUS INFO	VC11790.EDP.LE TTER CBI.PDF	EA12-005 – Chrysler - 003589		
	VC11790 CONF BUS INFO	VC11790.LET.LE TTER CBI.PDF	EA12-005 – Chrysler - 003591		
	VC11790 CONF BUS INFO	VC11790.TVA.T VALUE CBI.PDF	EA12-005 – Chrysler - 003586		

EA12-005 - Enclosure 6C - Summary of 301 Crash Tests Conf Bus Info
CONFIDENTIAL DOCUMENTS CHART

BODY STYLE FOLDER	FILE/DOCUMENT NAME	BATES PAGE #	DOCUMENT DESCRIPTION	CONFIDENTIALITY JUSTIFICATION
KJ FMVSS 301 Test History	Liberty (KJ) Development Test Summaries CBI.pdf	EA12-005 – Chrysler - 013272	Vehicle Developmental Testing	The disclosure of this information could enable a competitor to develop and upgrade its own testing protocols and improve its design decisions.
XJ FMVSS 301 Test History	Cherokee (XJ) Development Summaries CBI. pdf	EA12-005 – Chrysler – 013273- 13274		

EA12-005 - Enclosure 6F - Fuel Tank Location Information Conf Bus Info
CONFIDENTIAL DOCUMENTS CHART

FILE/DOCUMENT NAME	BATES PAGE #	DOCUMENT DESCRIPTION	CONFIDENTIALITY JUSTIFICATION
Fuel Tank Location Information CONF BUS INFO.pdf	EA12-005 – Chrysler – 034818-34831	Fuel Tank Location Information	The document reveals valuable information into Chrysler's design philosophies, including how Chrysler weighs various factors in making design decisions. Especially when considered in conjunction with publicly available information about Chrysler's vehicles, the document therefore would provide competitively valuable information that would enable competitors to bring their own products more quickly and at less cost.

EA12-005 - Enclosure 7B Subject Component Design History Conf Bus Info
CONFIDENTIAL DOCUMENTS CHART

FILE/DOCUMENT NAME	BATES PAGE #	DOCUMENT DESCRIPTION	CONFIDENTIALITY JUSTIFICATION
Production Change History 1993 - 2001 MY Cherokee Conf Bus Info.pdf	EA12-005 – Chrysler – 034806-34807	Change History	The disclosure of this information could enable competitors to improve their own designs and manufacturing processes, and compete more effectively against Chrysler Group.

**EA12-005 - Enclosure 8B – Subject Vehicle Graphics Conf Bus Info
CONFIDENTIAL DOCUMENTS CHART**

FOLDER	MODEL YEAR FOLDE R	FILE/DOCUMENT NAME	BATES PAGE #	DOCUMENT DESCRIPTION	CONFIDENTIALITY JUSTIFICATION
KJ 02 - 07 Graphics CBI	02 KJ CBI	KJ 2002 BIW Weld - 24.PAN ASSY-REAR FLOOR COMP Graphics CBI.pdf	EA12-005 – Chrysler – 003593 -3612	Engineering Graphics	Competitors could use this design information to improve their own designs without incurring the time and expense associated with independent design efforts.
		KJ 2002 TCF 09000 - AXLES _REAR AXLE 9220 Graphics CBI.pdf	EA12-005 – Chrysler – 003613-3616		
		KJ 2002 TCF 11000 - FRAME_TOW HOOKS_HITCH ASSY 11220 Graphics CBI.pdf	EA12-005 – Chrysler – 003617 -3621		
		KJ 2002 TCF 13000 - FUEL SYSTEM_ FUEL FILL-VENT TUBE Graphics CBI.pdf	EA12-005 – Chrysler – 003622-3623		
		KJ 2002 TCF 13000 - FUEL SYSTEM_ FUEL LINES Graphics CBI.pdf	EA12-005 – Chrysler – 003624-3631		
		KJ 2002 TCF 13000 - FUEL SYSTEM_ FUEL TANK Graphics CBI.pdf	EA12-005 – Chrysler – 003632-3637		
		KJ 2002 TCF 15000 - EXHAUST SYSTEM Graphics CBI.pdf	EA12-005 – Chrysler – 003638-3645		
		KJ 2002 TCF 21000 – BUMPERS_FRT- RR FASCIA CBI.pdf	EA12-005 – Chrysler – 003646-3655		

KJ 02 - 07 Graphics CBI (cont.)	03 KJ CBI	KJ 2003 BIW Weld - 24.PAN ASSY-REAR FLOOR COMP Graphics CBI.pdf	EA12-005 – Chrysler – 003656-3675	Engineering Graphics	Competitors could use this design information to improve their own designs without incurring the time and expense associated with independent design efforts.
		KJ 2003 TCF 09000 - AXLES _REAR AXLE 9220 Graphics CBI.pdf	EA12-005 – Chrysler – 003676-3679		
		KJ 2003 TCF 11000 - FRAME_TOW HOOKS_HITCH ASSY 11220 Graphics CBI.pdf	EA12-005 – Chrysler – 003680-3684		
		KJ 2003 TCF 13000 - FUEL SYSTEM_ FUEL FILL-VENT TUBE Graphics CBI.pdf	EA12-005 – Chrysler – 003685-3686		
		KJ 2003 TCF 13000 - FUEL SYSTEM_ FUEL LINES Graphics CBI.pdf	EA12-005 – Chrysler – 003687-3695		
		KJ 2003 TCF 13000 - FUEL SYSTEM_ FUEL TANK Graphics CBI.pdf	EA12-005 – Chrysler – 003696-3701		
		KJ 2003 TCF 15000 - EXHAUST SYSTEM Graphics CBI.pdf	EA12-005 – Chrysler – 003702-3710		
		KJ 2003 TCF 21000 – BUMPERS_FRT- RR FASCIA CBI.pdf	EA12-005 – Chrysler – 003711-3720		
	04 KJ CBI	KJ 2004 BIW Weld - 24.PAN ASSY-REAR FLOOR COMP Graphics CBI.pdf	EA12-005 – Chrysler – 003721-3740		
		KJ 2004 TCF 09000 - AXLES _REAR AXLE 9220 Graphics CBI.pdf	EA12-005 – Chrysler – 003741-3744		

KJ 02 - 07 Graphics CBI (cont.)	04 KJ CBI (cont.)	KJ 2004 TCF 11000 - FRAME_TOW HOOKS_HITCH ASSY 11220 Graphics CBI.pdf	EA12-005 – Chrysler – 003745-3749	Engineering Graphics	Competitors could use this design information to improve their own designs without incurring the time and expense associated with independent design efforts.
		KJ 2004 TCF 13000 - FUEL SYSTEM_ FUEL FILL-VENT TUBE Graphics CBI.pdf	EA12-005 – Chrysler – 003750-3751		
		KJ 2004 TCF 13000 - FUEL SYSTEM_ FUEL LINES Graphics CBI.pdf	EA12-005 – Chrysler – 003752-3759		
		KJ 2004 TCF 13000 - FUEL SYSTEM_ FUEL TANK Graphics CBI.pdf	EA12-005 – Chrysler – 003760-3765		
		KJ 2004 TCF 15000 - EXHAUST SYSTEM Graphics CBI.pdf	EA12-005 – Chrysler – 003766-3773		
		KJ 2004 TCF 21000 – BUMPERS_FRT- RR FASCIA CBI.pdf	EA12-005 – Chrysler – 003774-3683		
	05 KJ CBI	KJ 2005 BIW Weld - 24.PAN ASSY-REAR FLOOR COMP Graphics CBI.pdf	EA12-005 – Chrysler – 003784-3803		
		KJ 2005 TCF 09000 - AXLES_REAR AXLE 9220 Graphics CBI.pdf	EA12-005 – Chrysler – 003804-3807		
		KJ 2005 TCF 11000 - FRAME_TOW HOOKS_HITCH ASSY 11220 Graphics CBI.pdf	EA12-005 – Chrysler – 003808-3812		
		KJ 2005 TCF 13000 - FUEL SYSTEM_ FUEL FILL-VENT TUBE Graphics CBI.pdf	EA12-005 – Chrysler – 003813-3814		

KJ 02 - 07 Graphics CBI (cont.)	05 KJ CBI (cont.)	KJ 2005 TCF 13000 - FUEL SYSTEM_ FUEL LINES Graphics CBI.pdf	EA12-005 – Chrysler – 003815-3822	Engineering Graphics	Competitors could use this design information to improve their own designs without incurring the time and expense associated with independent design efforts.
		KJ 2005 TCF 13000 - FUEL SYSTEM_ FUEL TANK Graphics CBI.pdf	EA12-005 – Chrysler – 003823-3829		
		KJ 2005 TCF 15000 - EXHAUST SYSTEM Graphics CBI.pdf	EA12-005 – Chrysler – 003830-3837		
		KJ 2005 TCF 21000 – BUMPERS_FRT- RR FASCIA CBI.pdf	EA12-005 – Chrysler – 003838-3847		
	06 KJ CBI	KJ 2006 BIW Weld - 24.PAN ASSY-REAR FLOOR COMP Graphics CBI.pdf	EA12-005 – Chrysler – 003848-3867		
		KJ 2006 TCF 09000 - AXLES_REAR AXLE 9220 Graphics CBI.pdf	EA12-005 – Chrysler – 003868-3870		
		KJ 2006 TCF 11000 - FRAME_TOW HOOKS_HITCH ASSY 11220 Graphics CBI.pdf	EA12-005 – Chrysler – 003871-3875		
		KJ 2006 TCF 13000 - FUEL SYSTEM_ FUEL FILL-VENT TUBE Graphics CBI.pdf	EA12-005 – Chrysler – 003876-3877		
		KJ 2006 TCF 13000 - FUEL SYSTEM_ FUEL LINES Graphics CBI.pdf	EA12-005 – Chrysler – 003878-3885		
		KJ 2006 TCF 13000 - FUEL SYSTEM_ FUEL TANK Graphics CBI.pdf	EA12-005 – Chrysler – 003886-3892		
		KJ 2006 TCF 15000 - EXHAUST SYSTEM Graphics CBI.pdf	EA12-005 – Chrysler – 003893-3900		

KJ 02 - 07 Graphics CBI (cont.)	06 KJ CBI (cont.)	KJ 2006 TCF 21000 – BUMPERS_FRT- RR FASCIA CBI.pdf	EA12-005 – Chrysler – 003901-3910	Engineering Graphics	Competitors could use this design information to improve their own designs without incurring the time and expense associated with independent design efforts.
	07 KJ CBI	KJ 2007 BIW Weld - 24.PAN ASSY-REAR FLOOR COMP Graphics CBI.pdf	EA12-005 – Chrysler – 003911-3930		
		KJ 2007 TCF 09000 - AXLES _REAR AXLE 9220 Graphics CBI.pdf	EA12-005 – Chrysler – 003931-3933		
		KJ 2007 TCF 11000 - FRAME_TOW HOOKS_HITCH ASSY 11220 Graphics CBI.pdf	EA12-005 – Chrysler – 003934-3938		
		KJ 2007 TCF 13000 - FUEL SYSTEM_ FUEL FILL-VENT TUBE Graphics CBI.pdf	EA12-005 – Chrysler – 003939-3940		
		KJ 2007 TCF 13000 - FUEL SYSTEM_ FUEL LINES Graphics CBI.pdf	EA12-005 – Chrysler – 003941-3948		
		KJ 2007 TCF 13000 - FUEL SYSTEM_ FUEL TANK Graphics CBI.pdf	EA12-005 – Chrysler – 003949-3955		
		KJ 2007 TCF 15000 - EXHAUST SYSTEM Graphics CBI.pdf	EA12-005 – Chrysler – 003956-3963		
		KJ 2007 TCF 21000 – BUMPERS_FRT- RR FASCIA CBI.pdf	EA12-005 – Chrysler – 003964-3974		

XJ 93 - 01 Graphics CBI	XJ 92 – 93 CBI	92-93 XJ EXHAUST CBI.pdf	EA12-005 – Chrysler – 003975-3976	Engineering Graphics	Competitors could use this design information to improve their own designs without incurring the time and expense associated with independent design efforts.
		92-93 XJ FUEL FILLER TUBE CBI.pdf	EA12-005 – Chrysler – 003977-3978		
		92-93 XJ FUEL LINES CBI.pdf	EA12-005 – Chrysler – 003979-3985		
		92-93 XJ FUEL TANK SKID PLATES CBI.pdf	EA12-005 – Chrysler – 003986-3987		
		92-93 XJ RR BUMPER CBI.pdf	EA12-005 – Chrysler – 003988-3990		
		92-93 XJ RR STRUCTURE CBI.pdf	EA12-005 – Chrysler – 003991-3993		
		92-93 XJ RR SUSPENSION CBI.pdf	EA12-005 – Chrysler – 003994-3999		
		92-93 XJ TRAILER TOW CBI.pdf	EA12-005 – Chrysler – 004000-4001		
	XJ 94 – 95 CBI	94-95 XJ EXHAUST SYSTEM CBI.pdf	EA12-005 – Chrysler – 004002-4005		
		94-95 XJ FUEL LINES CBI.pdf	EA12-005 – Chrysler – 004006-4009		
		94-95 XJ FUEL LINES-Diesel CBI.pdf	EA12-005 – Chrysler – 004010-4011		
		94-95 XJ FUEL TANK SKID PLATES CBI.pdf	EA12-005 – Chrysler – 004012-4013		
		94-95 XJ FUEL TANK CBI.pdf	EA12-005 – Chrysler – 004014-4017		

XJ 93 - 01 Graphics CBI (cont.)	XJ 94 – 95 CBI (cont.)	94-95 XJ RR BUMPER CBI.pdf	EA12-005 – Chrysler – 004018-4019	Engineering Graphics	Competitors could use this design information to improve their own designs without incurring the time and expense associated with independent design efforts.
		94-95 XJ RR STRUCTURE CBI.pdf	EA12-005 – Chrysler – 004020-4022		
		94-95 XJ RR SUSPENSION CBI.pdf	EA12-005 – Chrysler – 4023-4025		
		94-95 XJ TRAILER TOWING HITCH CBI.pdf	EA12-005 – Chrysler – 004026-4028		
	XJ 96 – 97 CBI	96-97 XJ EXHAUST SYSTEM CBI.pdf	EA12-005 – Chrysler – 004029-4034		
		96-97 XJ FUEL FLLR TUBE-SKID PLATES CBI.pdf	EA12-005 – Chrysler – 004035-4037		
		96-97 XJ FUEL LINES CBI.pdf	EA12-005 – Chrysler – 004038-4039		
		96-97 XJ RR BUMPER CBI.pdf	EA12-005 – Chrysler – 004040-4041		
		96-97 XJ RR FLOOR PAN CBI.pdf	EA12-005 – Chrysler – 004042-4044		
		96-97 XJ RR STAB BAR-SUSP CBI.pdf	EA12-005 – Chrysler – 004045-4046		
		96-97 XJ RR STRUCTURE CBI.pdf	EA12-005 – Chrysler – 004047-4050		
		96-97 XJ TRAILER TOW CBI.pdf	EA12-005 – Chrysler – 004051-4054		
		96 XJ FUEL TANK CBI.pdf	EA12-005 – Chrysler – 004055-4056		

XJ 93 - 01 Graphics CBI (cont.)	XJ 96 – 97 CBI (cont.)	97 XJ FUEL TANK CBI.pdf	EA12-005 – Chrysler – 004057-4058	Engineering Graphics	Competitors could use this design information to improve their own designs without incurring the time and expense associated with independent design efforts.
	XJ 98 – 99 CBI	XJ 98 - 99 Body In White Graphics CBI.pdf	EA12-005 – Chrysler – 004059-4062		
		XJ 98 - 99 Exhaust System Graphics CBI.pdf	EA12-005 – Chrysler – 004063-4066		
		XJ 98 - 99 Fuel Line Graphics CBI.pdf	EA12-005 – Chrysler – 004067-4074		
		XJ 98 - 99 Fuel tank & Skid Plate Graphics CBI.pdf	EA12-005 – Chrysler – 004075-4077		
		XJ 98 - 99 Rear Axle Graphics CBI.pdf	EA12-005 – Chrysler – 004078		
		XJ 98 - 99 Rear Suspension CBI.pdf	EA12-005 – Chrysler – 004079-4081		
		XJ 98 - 99 Trailer Tow Graphics CBI.pdf	EA12-005 – Chrysler – 004082-4083		
	XJ 00 CBI	2000 XJ BUMPERS CBI.pdf	EA12-005 – Chrysler – 004084-4096		
		2000 XJ EXHAUST CBI.pdf	EA12-005 – Chrysler – 004097-4105		
		2000 XJ FUEL LINES CBI.pdf	EA12-005 – Chrysler – 004106-4115		
		2000 XJ FUEL TANK CBI.pdf	EA12-005 – Chrysler – 004116-4119		
		2000 XJ FUEL TUBE CBI.pdf	EA12-005 – Chrysler – 004120-4122		

XJ 93 - 01 Graphics CBI (cont.)	XJ 00 CBI (cont.)	2000 XJ REAR AXLE CBI.pdf	EA12-005 – Chrysler – 004123-4125	Engineering Graphics	Competitors could use this design information to improve their own designs without incurring the time and expense associated with independent design efforts.
		2000 XJ REAR FLOOR CBI.pdf	EA12-005 – Chrysler – 004126-4131		
		2000 XJ REAR SUSP CBI.pdf	EA12-005 – Chrysler – 004132-4140		
		2000 XJ TOW HOOK- HITCH CBI.pdf	EA12-005 – Chrysler – 004141-4151		
	XJ 01 CBI	2001 XJ BUMPERS CBI.pdf	EA12-005 – Chrysler – 004152-4165		
		2001 XJ EXHAUST CBI.pdf	EA12-005 – Chrysler – 004166-4176		
		2001 XJ FUEL LINES CBI.pdf	EA12-005 – Chrysler – 004177-4186		
		2001 XJ FUEL TANK CBI.pdf	EA12-005 – Chrysler – 004187-4190		
		2001 XJ REAR AXLE CBI.pdf	EA12-005 – Chrysler – 004191-4193		
		2001 XJ REAR FLOOR. CBI pdf	EA12-005 – Chrysler – 004194-4198		
		2001 XJ REAR SUSP CBI.pdf	EA12-005 – Chrysler – 004199-4207		
		2001 XJ TOW HOOK- HITCH CBI.pdf	EA12-005 – Chrysler – 004208-4219		