



**GENERAL MOTORS LLC**  
Vehicle Safety and Crashworthiness

February 18, 2013

O. Kevin Vincent, Esq. Chief Counsel  
Office of Chief Counsel (NCC-111)  
NHTSA, West Building W41-227  
1200 New Jersey Avenue, SE  
Washington, DC 20590

N120335

NVS-212pco  
EA12-005

Dear Mr. Vincent:

Enclosed with this letter are three copies of General Motors' (GM) February 18, 2013, voluntary response to the NHTSA's information request (IR) received on December 20, 2012, requesting GM peer vehicle data to assist in your investigation of allegations of crash related fire hazards associated with the fuel storage systems on model year (MY) 1993-2004 Jeep Grand Cherokee, MY 1993-2001 Jeep Cherokee, and MY 2002-2007 Jeep Liberty vehicles.

Two copies include the confidential documents and the third does not.

GM understands that there is no alleged defect with respect to any of its vehicles and is providing this information voluntarily as part of the agency's investigation of another manufacturer's vehicles.

GM requests that the documents stamped "GM Confidential Business Information" included in ATT\_2\_GM\_CONF disk be afforded confidential treatment without a time limitation by the NHTSA. This information is voluntarily submitted and is the kind of information that is customarily not released to the public by General Motors and contains trade secrets and commercial information which is privileged or confidential under 5 U.S.C. Section 552(b)(4), 49 CFR Part 512 and 49 U.S.C. Section 30167(a).

The following identifies the specific type of confidential information contained in the documents:

Response	Document Folder(s)	Information types
5	Q_05	Summary of vehicle content, material use, scaled dimensions, and screen prints of math data
6	Q_06	GM test results, summaries, analysis, and judgment related to the performance of the subject components for MVSS 301 rear impact and other MVSS testing.
6	Q_06	GM Vehicle technical Specifications and Subsystem Technical Specifications for the Fuel Storage & Handling system for the subject peer vehicles.
6	Q_06	GM test results, summaries, analysis, and judgment related to the performance of the subject components to GM's internal test requirements.



Documents in response to Q\_05 and Q\_06 on the ATT\_2\_GM\_CONF disk identified above disclose information about GM's application of engineering judgment, analysis, methodologies and action. This information would give competitors insight into GM's methodologies and disclose confidential information about the design and performance of its products, without spending their own resources or compensating GM for the knowledge they would gain.

GM treats the above material as confidential proprietary information available only to authorized GM, supplier and customer personnel who have a business need for it, and it is not otherwise available to the public. These documents are maintained under a record-keeping system that is intended to control dissemination of this material within GM and supplier and customer personnel, and to assure that it is not freely disseminated outside the Corporation.

To the best of our knowledge, no prior determinations of the confidentiality of the documents submitted with this request have been made by the NHTSA, other Federal Agencies or the Federal Courts. Documents such as those containing engineering testing procedures have normally been granted confidential treatment by the NHTSA in the past.

The document subject to this request for confidentiality are being provided and have been clearly stamped "GM Confidential Business Information" on the disk label. If a request for disclosure of any or all of this information is received by the NHTSA, General Motors requests notification of receipt of each such request and, if necessary, an opportunity to further explain the reasons why such material is trade secret and commercial information which should not be disclosed under the applicable statutes and regulations.

If you require further information about this request, please do not hesitate to call me.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Carmen Benavides", with a stylized flourish at the end.

M. Carmen Benavides, Director  
Product Investigations and Safety Regulations

Attachment



## **CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY**

I, M. Carmen Benavides, pursuant to the provisions of 49 CFR Part 512, state as follows:

- (1) I am the Director of Product Investigations and Safety Regulations of General Motors LLC and am authorized to execute this certificate on its behalf.
- (2) I certify that the information contained in the documents identified in the letter dated February 18, 2013, 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) and 49 C.F.R. Part 512.
- (3) I hereby request that the information be protected without time limitation.
- (4) This certification is based on the information provided by the responsible GM personnel who have responsibility for the documents being provided to the NHTSA for which a claim of confidentiality has been made.
- (5) Based on that information, to the best of my knowledge, information and belief, the information for which GM has claimed confidential treatment has never been released or made available outside GM, GM supplier or GM customer personnel, except as required by law.
- (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 GM because of unauthorized or inadvertent disclosure.
- (7) I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 18<sup>th</sup> day of February, 2013.

A handwritten signature in blue ink, appearing to read "M. Carmen Benavides", with a stylized flourish at the end.

M. Carmen Benavides, Director  
Product Investigations and Safety Regulations