

April 1, 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

N130070
NVS-215/aa
AQ12-002
12V-288

Dear Mr. Vincent:

Enclosed with this letter are General Motors' (GM) confidential materials referenced in the GM response to the agency's February 25, 2013, Audit Query (AQ12-002). GM is submitting this information voluntarily to Ms. Jennifer T. Timian, Chief, Recall Management Division.

GM requests that the material stamped "GM Confidential Business Information" included in ATT_2_GM_Conf disk, in the folders labeled "Q_01", "Q_03" and "Q_06" be afforded confidential treatment without a time limitation by the NHTSA.

This information is a voluntary submission to the agency and is the kind of information that is customarily not released to the public by General Motors, and contains commercial information which is confidential under 5 U.S.C. Section 552(b)(4), 49 CFR Part 512 and 49 U.S.C. Section 30167(a).

GM treats the above material as confidential information available only to authorized GM, and dealer personnel who have a business need for them, and is not otherwise available to the public.

The documents 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, GM requests notification of receipt of each such request and, if necessary, an opportunity to further explain the reasons why such material is commercial information which should not be disclosed under the applicable statutes and regulations.

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

Sincerely,



M. Carmen Benavides, Director
Product Investigations and Safety Regulations

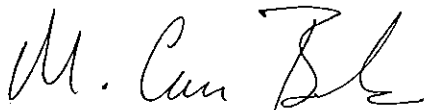
Enclosure



**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 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 document identified in the letter dated April 1, 2013, is confidential 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 a time limitation.
- (4) This certification is based on the information provided by the responsible GM personnel who have responsibility for the document 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 is the kind of information that is customarily not released to the public by General Motors.
- (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 1st day of April, 2013.



M. Carmen Benavides, Director
Product Investigations and Safety Regulations