



GENERAL MOTORS LLC
Vehicle Safety and Crashworthiness

February 14, 2014

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

N130146
NHTSA Discussion
EA13007

Dear Mr. Vincent:

Enclosed with this letter are materials prepared by General Motors (GM) following its February 10, 2014, phone conference with Scott Yon, Chief, Office of Defect Investigations. GM is submitting this information voluntarily to Mr. Yon as a follow up to that discussion.

Submitted with this letter are three copies of GM's February 10, 2014, presentation to the NHTSA regarding allegations of simultaneous loss of both low beam headlights without warning while operating model year (MY) 2005-2013 Chevrolet Corvette vehicles manufactured by General Motors LLC (GM). Two copies include the confidential documents and the third does not.

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 a voluntary submission to the agency and is the kind of information that is customarily not released to the public by GM, and contains trade secrets and confidential 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).

GM treats the above material as confidential information available only to authorized GM and supplier personnel who have a business need for it, and 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 to assure that it is not freely disseminated outside the Corporation. Multiple security systems are used to limit access to facilities and record storage systems where confidential information is stored, and employees receive training in information security policies and procedures.

To the best of our knowledge, no prior determinations of the confidentiality of the information submitted with this request have been made by the NHTSA, other Federal Agencies or the Federal Courts. Documents such as these containing analysis

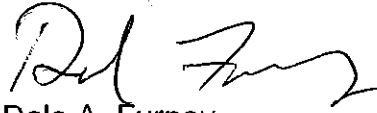


methodology have normally been granted confidential treatment by the NHTSA in the past.

The document subject to this request for confidentiality is being provided and has been clearly stamped "GM Confidential Business Information" on a 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 trade secret and 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,

A handwritten signature in black ink, appearing to read "Dale Furney". The signature is written in a cursive style with a large initial "D" and a long horizontal stroke at the end.

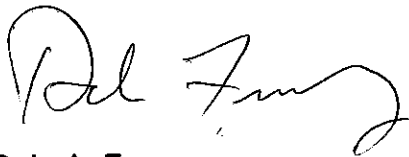
Dale A. Furney
Engineering Group Manager
GM Product Investigations

Attachment

**CERTIFICATE IN SUPPORT OF
REQUEST FOR CONFIDENTIALITY**

I, Dale A. Furney, pursuant to the provisions of 49 CFR Part 512, state as follows:

- (1) I am an Engineering Group Manager in the Product Investigations Group 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 February 14, 2014, 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 GM personnel who have responsibility for the information 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 GM, except as may be 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 14th day of February, 2014.



Dale A. Furney
Engineering Group Manager
GM Product Investigations