

INFORMATION Redacted PURSUANT TO THE FREEDOM OF
INFORMATION ACT (FOIA), 5 U.S.C . 552(B)(6)



Kia Motors America, Inc.

Corporate Headquarters

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VIA FEDERAL EXPRESS

June 16, 2016

Paul A. Hemmersbaugh, Esq.
Office of Chief Counsel (NCC-111)
National Highway Traffic Safety Administration
Room W41-227
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: Request for Confidential Treatment of Documents Submitted in Response to
In re: EA 14-002 Kia Sorento Sunroofs General Order to Motor Vehicle
Manufacturers

Dear Mr. Hemmersbaugh:

On behalf of Kia Motors Corporation and Kia Motors America, Inc. ("Kia"), Kia Motors America, Inc. ("KMA"), hereby requests that certain documents being provided in Kia's response to the General Order to Motor Vehicle Manufacturers in In re Kia Sorento Sunroofs (EA14-002) dated June 16, 2016 be treated as confidential. Two (2) confidential copies are being submitted as Kia is seeking confidential treatment of the documents in their entirety. In accordance with 49 C.F.R. 512.3(c), confidential business information includes trade secrets or commercial or financial information that is privileged or confidential as described in the Freedom of Information Act. See 5 U.S.C. 522(b)(4). Commercial information is considered confidential if it has not been publicly disclosed and if its release is likely to cause substantial harm to Kia's competitive position. 49 C.F.R. 512.3.

In its Response, Kia provided certain testing data conducted by it or on its behalf as well as engineering changes that it claims is confidential business information. Specifically, Kia submitted the following:

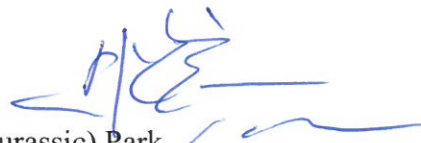
- FMVSS 205 Compliance testing, dated January 19, 2010 applicable to the sunroof glass used in the 2011-2013 MY Sorento (Tab 2.1);
- FMVSS 205 Compliance testing, dated April 28, 2006, June 19, 2009, September 27, 2011, June 29, 2012 and June 16, 2015 applicable to the sunroof glass used in the 2014-2016 MY Sorento, 2011-2016 MY Sportage, 2014-2016 MY Cadenza and 2015-2016 MY K900 (Tab 2.2);

- FMVSS 205 Compliance testing, dated November 26, 2007, September 30, 2010, September 27, 2011 and November 25, 2013 applicable to the 2011-2016 MY Optima and 2014-2016 MY Soul (Tab 2.3);
- Summary of Panorama Sunroof Engineering Changes for 2011-2016 MY Sorento (Tab 2.4);
- Summary of Panorama Sunroof Engineering Changes for 2011-2016 MY Optima (Tab 2.5);
- Summary of Panorama Sunroof Engineering Changes for 2011-2016 MY Sportage (Tab 2.6);
- Summary of Panorama Sunroof Engineering Changes for 2014-2016 MY Soul (Tab 2.7);
- Summary of Panorama Sunroof Engineering Changes for 2014-2016 MY Cadenza (Tab 2.8); and
- Summary of Panorama Sunroof Engineering Changes for 2015-2016 MY K900 (Tab 2.9)

These documents were prepared by Kia or on Kia's behalf and contain both trade secrets and/ or confidential information that, if made public, would cause substantial harm to Kia's competitive position in the market, as well as its suppliers. These documents contain design and material specifications and testing procedures, which if disseminated would allow Kia's competitors the benefit of knowing its testing procedures and design and material specifications. These documents were created for the benefit of Kia and have never been disseminated to third parties except for disclosure to manufacturers, customers and suppliers, who were provided the information with the understanding that such information must be maintained in confidence.

If you have any questions or concerns regarding this matter, or if you need any further clarification or support for this request, please do not hesitate to contact me.

Sincerely,



J.S. (Jurassic) Park
Executive Director Product Litigation
& Regulatory Compliance

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, J.S. (Jurassic) Park, pursuant to the provisions of 49 CFR part 512, state as follows:

(1) I am the Executive Director of Product Liability and Regulatory Compliance for Kia Motors America, Inc. ("KMA"). I am authorized by KMA and Kia Motors Corp. ("KMC") to execute this certificate on their behalf;

(2) I certify that the information contained in the documents being submitted by KMA and KMC in relation to the National Traffic and Highway Safety Administration's (NHTSA) General Order Directed to Motor Vehicle Manufacturers to assist the agency in its investigation into Kia Sorento sunroofs (EA14-002) 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) (as incorporated by reference in and modified by statute under which the information is being submitted);

- FMVSS 205 Compliance testing, dated January 19, 2010 applicable to the sunroof glass used in the 2011-2013 MY Sorento (Tab 2.1);
- FMVSS 205 Compliance testing, dated April 28, 2006, June 19, 2009, September 27, 2011, June 29, 2012 and June 16, 2015 applicable to the sunroof glass used in the 2014-2016 MY Sorento, 2011-2016 MY Sportage, 2014-2016 MY Cadenza and 2015-2016 MY K900 (Tab 2.2);
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- Summary of Panorama Sunroof Engineering Changes for 2014-2016 MY Soul (Tab 2.7);
- Summary of Panorama Sunroof Engineering Changes for 2014-2016 MY Cadenza (Tab 2.8); and
- Summary of Panorama Sunroof Engineering Changes for 2015-2016 MY K900

(Tab 2.9).

(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 Kia 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 of Kia;

(5) Based upon that information, to the best of my knowledge, information and belief, the information for which Kia has claimed confidential treatment has never been released or become available outside of Kia; except for disclosures to manufacturers, customers and suppliers of the companies, who were provided the information 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 of the aforementioned companies because of unauthorized or inadvertent disclosure; and

(7) I certify under penalty of perjury that the foregoing is true and correct under the laws of the United States of America.

Executed on this 16th day of June, 2016.

Kia Motors America, Inc.

By: 
J.S. (Jurassic) Park, Executive Director,
Product Liability & Regulatory Compliance