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July 31, 2015

Aug 1, 2015

12:33 PM

By Messenger

Scott Yon, Chief
Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: ARC Automotive, Inc. – Response to July 17, 2015 Information Request, PE15-027.

Dear Mr. Yon:

Enclosed please find the response of ARC Automotive, Inc. to the Agency's July 17, 2015 information request in the above-referenced Preliminary Evaluation. ARC Automotive's response to Request No. 2 (Excel file) contains confidential business information. Accordingly, we have submitted that information today to the Office of Chief Counsel with a Part 512 request for confidential treatment.

Please contact me if you have any questions.

Sincerely,

Christopher H. Grigorian

Enclosures

cc: Ali El-haj (ARC Automotive, Inc.)
Ronald Mounger (ARC Automotive, Inc.)

ARC AUTOMOTIVE, INC.'S RESPONSE TO JULY 17, 2015 INFORMATION REQUEST IN PE15-027

ARC Automotive, Inc.'s response to the Agency's July 17, 2015 was prepared pursuant to a diligent search for the information requested. The scope of ARC Automotive's search for responsive information focused on data systems where responsive information is most likely to be maintained and on review of ARC Automotive files in which responsive information ordinarily would be expected to be found and to which ARC Automotive ordinarily would refer. ARC Automotive notes that although electronic information was included within the scope of its search, it has not attempted to retrieve from computer storage electronic files that were overwritten or deleted.

To the extent that the Agency's definition of ARC Automotive includes suppliers, contractors, and affiliated enterprises for which ARC Automotive does not exercise day-to-day operational control, we note that information belonging to such entities ordinarily is not ARC Automotive's possession, custody, or control.

ARC Automotive has construed this request as pertaining solely to subject components shipped to U.S. customers and to non-U.S. customers for installation in vehicles intended for sale in the United States (or where it is indeterminable whether the completed passenger vehicle could be sent to the U.S. market). This does not include products shipped to customers outside the United States that do not import completed passenger vehicles for sale in the U.S. market.

Request 1. *Describe the general nature and conduct of ARC's business, including the products that company produces, the businesses ARC sells its products to, ARC's manufacturing locations and operations, the general background and history of ARC and any other information ARC believes is pertinent or relevant to the investigation.*

Response: See Attachment 1.

Request 2. *Identify all Tier I companies and/or air bag module manufacturers to whom ARC provided the subject component for the time period from the start of production (SOP) up to September 2004. Separately, for each Tier I or air bag manufacturer (i.e., customer), provide the following additional information in a tabular format:*

a. Customer name (i.e., Key Safety Systems);

b. Customer contact information including the name(s) and title(s) of a person(s) familiar with the subject components, address, phone number(s), email address(es) and any other pertinent information;

c. Customer part number;

d. ARC part number;

e. Manufacturing location (including assembly line if pertinent);

f. Address the parts were shipped to;

g. *Any information ARC possesses regarding the final stage user/OEM of the part number;*

h. *Any information ARC possesses regarding the market (US or foreign) the part was intended for;*

i. *Total number of parts provided (for the manufacturing location in item e) by year and month of manufacture.*

Response:

Responsive information is contained in the file, "ARC Automotive - Response to Request Number 2 - PE15027 – CONFIDENTIAL," which has been submitted on a CD-ROM to the Office of Chief Counsel, along with a confidential treatment request pursuant to 49 C.F.R. Part 512.

* * *

If you have questions about this submission, please contact Ron Mounger, ARC Automotive, Inc., (865) 583-7744 or ron.mounger@arc-cpcn.com.

PE15-027

ARC FOLEY

7-17-2015

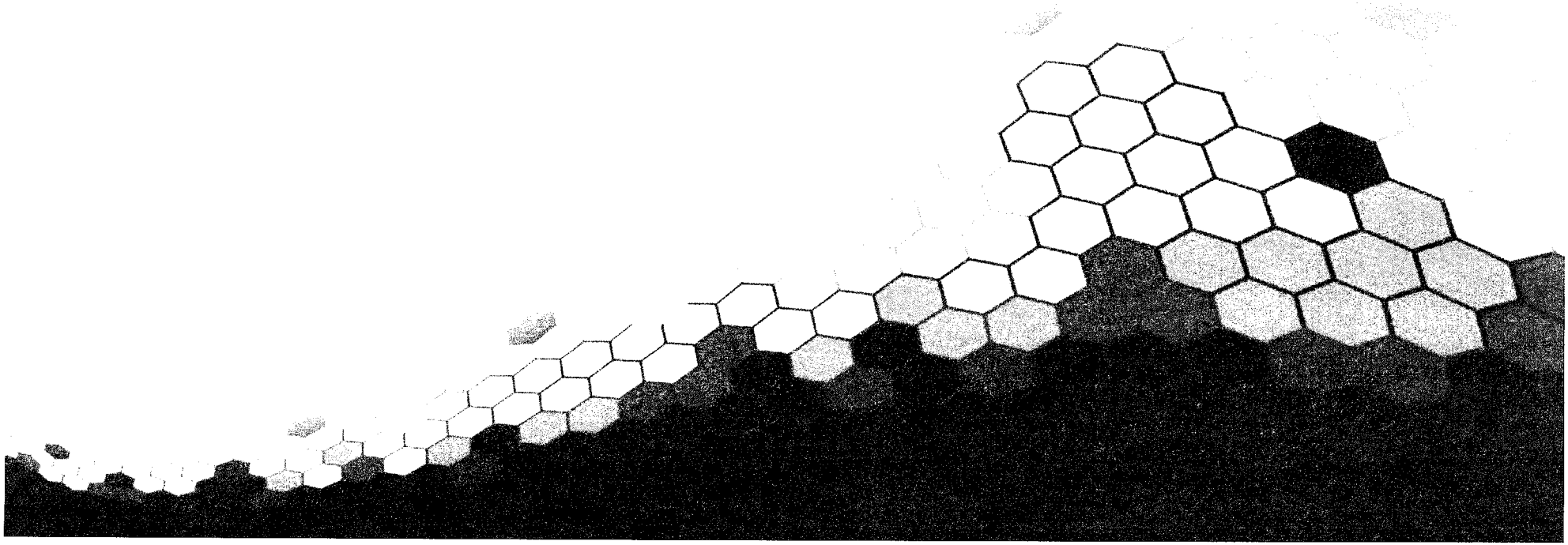
ATTACHMENT

ARC AUTOMOTIVE 2015

ARC

PIONEERING SAFETY. SINCE 1948

ARC Automotive
2015



ARC Automotive Summary

- ARC Automotive, Inc. (ARC) is a Tier 2 designer and manufacturer of airbag inflators. Primary customers are Tier 1 module manufacturers who in turn supply OEM's. ARC roots go back to 1949 when Atlantic Research Corporation began developing propellants for the Department of Defense. In 1989 Atlantic Research and AlliedSignal formed a joint venture named BAICO to manufacture airbag inflators. This joint venture was divested in 1998 and Atlantic Research acquired 100% ownership of BAICO renaming it as ARC Automotive, Inc.

- ARC's manufacturing footprint is worldwide. Headquartered in Knoxville, TN, manufacturing facility locations include: Knoxville, TN; Morgantown, KY; Reynosa, Mexico; and Xian, China (actually a joint venture with North Specialty Energy Group). In 2015 ARC is adding a new inflator manufacturing facility in Macedonia and propellant facility in Hartsville, TN.

- Current production portfolio includes inflators for knee, side, curtain, center seat, driver and passenger. Numerous inflator options are offered to provide Tier 1 manufacturers module design flexibility capable of meeting OEM performance requirements.

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ARC

ARC Automotive Overview

ARC
PIONEERING SAFETY. SINCE 1948

Business Description

- Leading independent designer and manufacturer of advanced inflators for driver, passenger, side-impact, seat and curtain airbag applications
- Over 60 years of design expertise in propellant and inflator technology

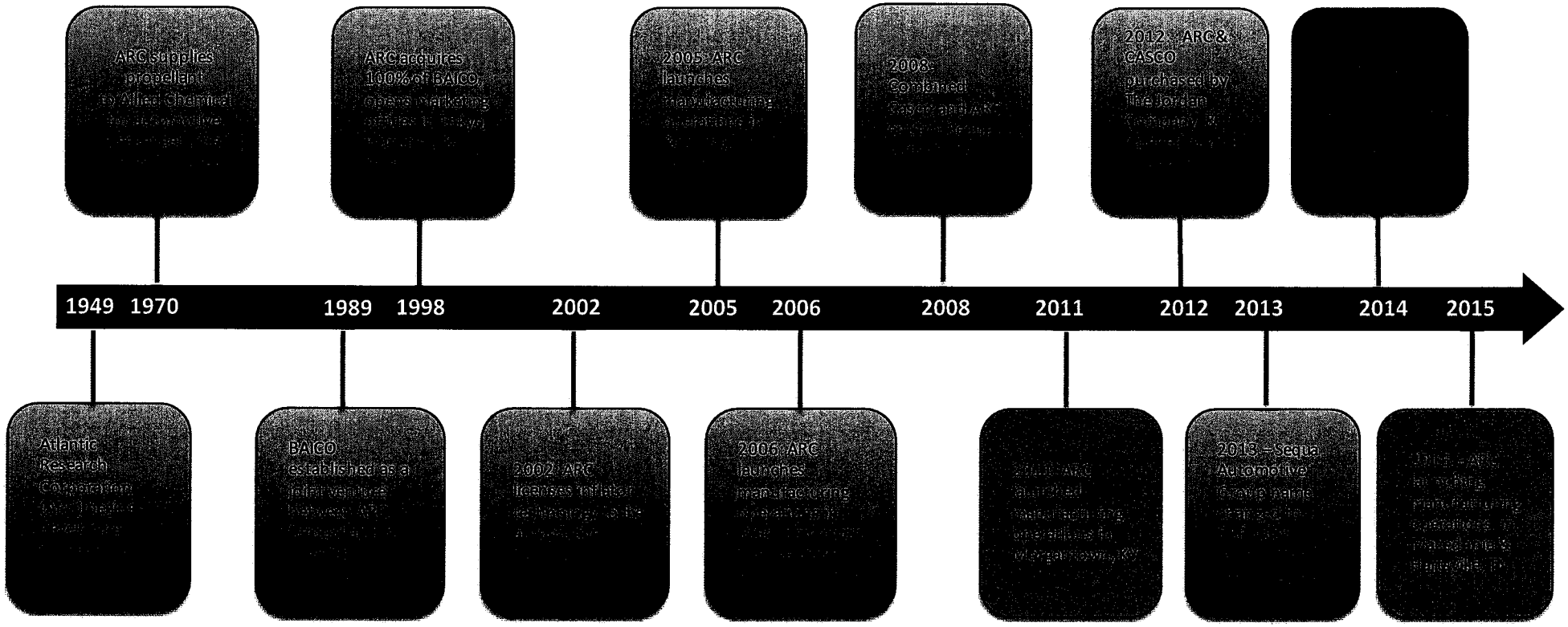
Key Statistics

- Total Global Employees: ~ 2,161
- R & D, Application Engineers ~43
- Manufacturing facilities: 4
- Currently building two New Manufacturing facilities:
  - Macedonia – Inflators
  - Hartsville, TN - Propellant
- Headquarters: Knoxville, TN

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ARC History

Company Milestones



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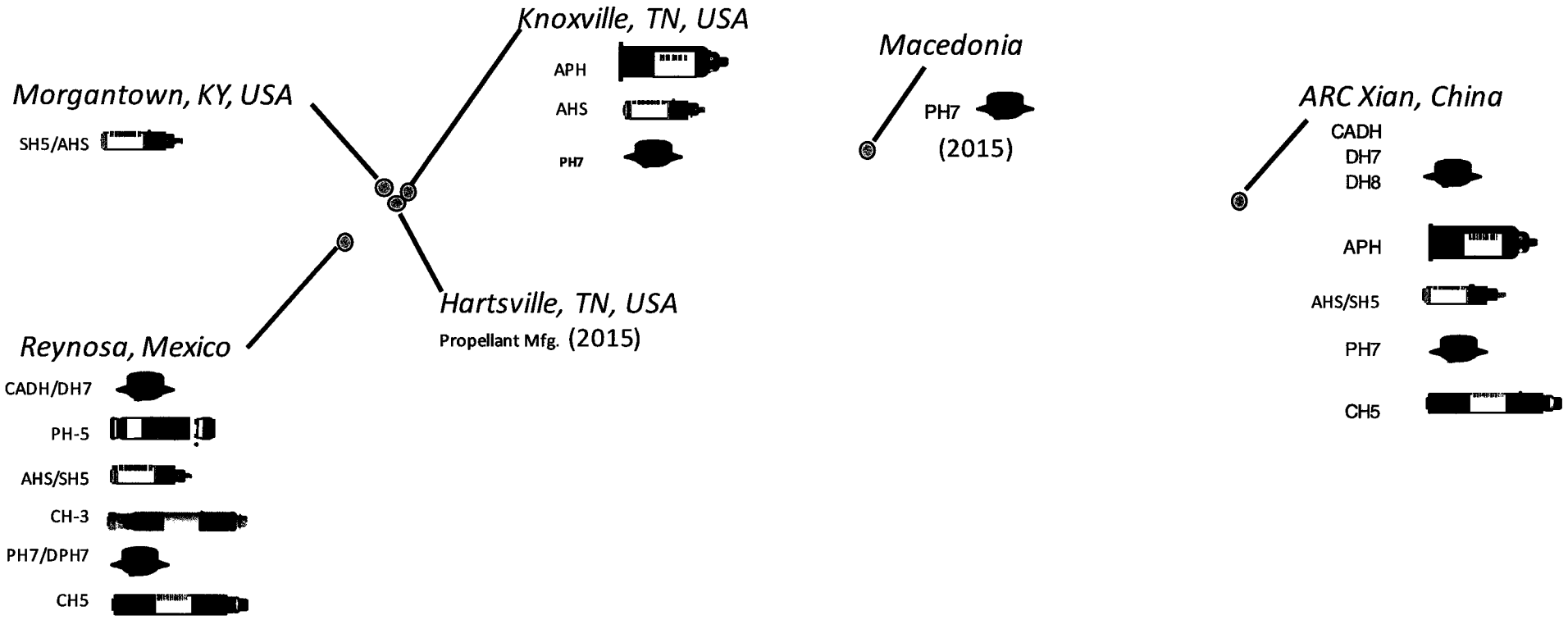
ARC Automotive Customers



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ARC Worldwide Production Locations

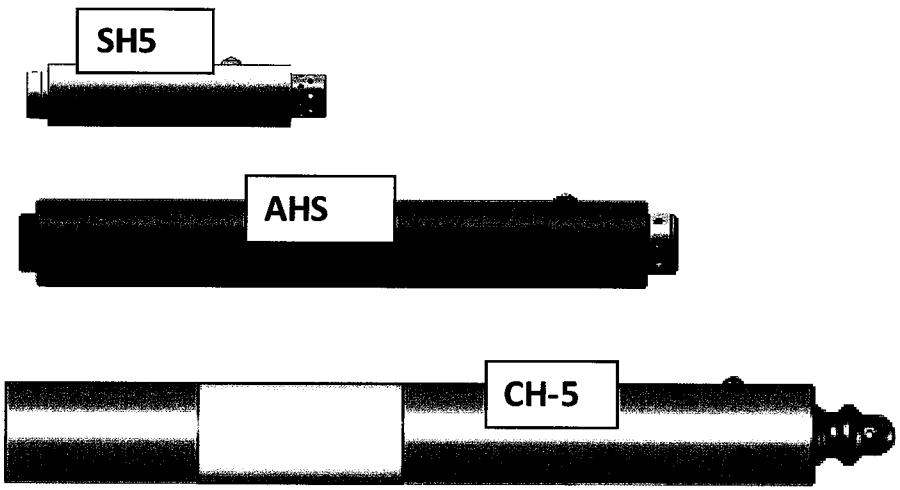


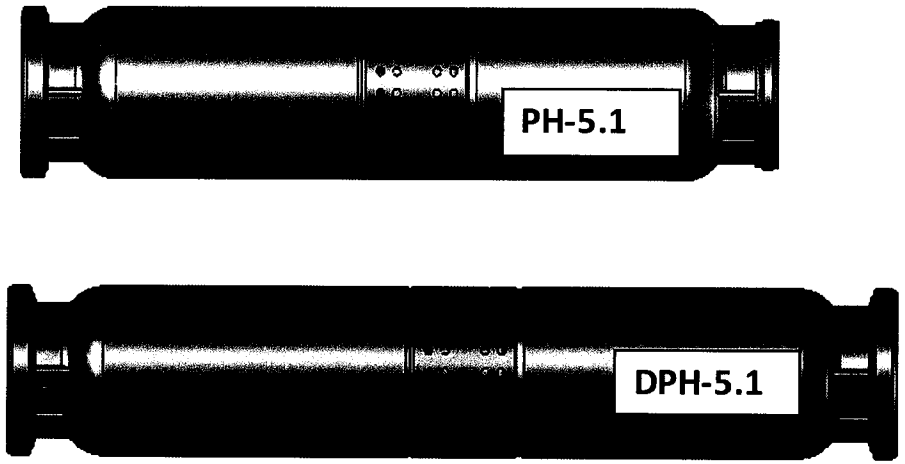
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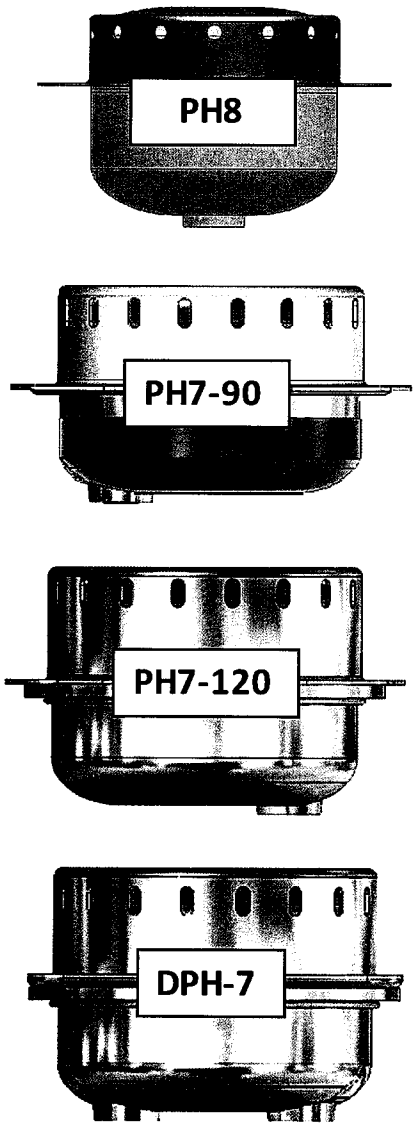
ARC

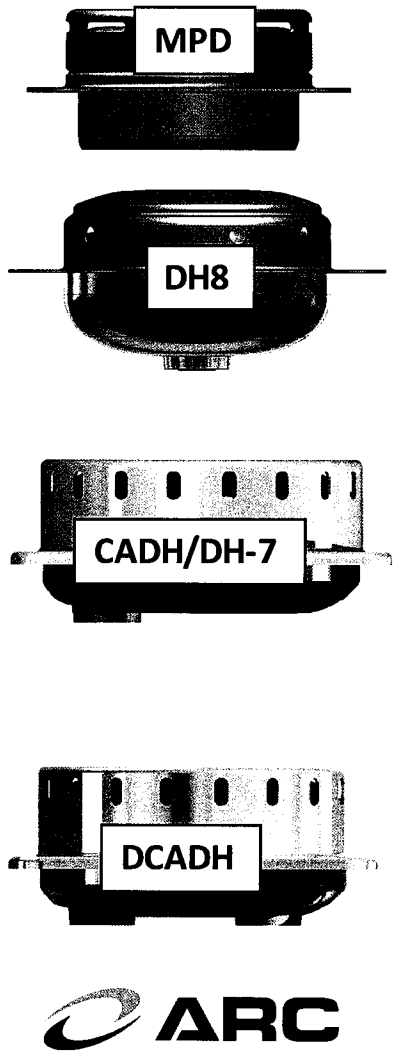
ARC Automotive, Inc. Current Production Product Offerings

Side/Curtain/Knee Hybrid	Passenger	Driver









ARC