



From Natalia R. Medley  
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Date August 16, 2019

**VIA FEDEX**

Jonathan C. Morrison  
Chief Counsel  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

**Re: Request for Confidential Treatment of Voluntary Submission**

Dear Mr. Morrison,

ZF submits this request for confidential treatment of information contained in the enclosed electronic materials as competitively sensitive and requests that it be withheld from public disclosure under 49 CFR part 512 and Exemption 4 of the Freedom of Information Act (FOIA), 5 U.S.C. § 552(b)(4).


ZF voluntarily submits the materials at NHTSA's request in connection with NHTSA EA19-001. The materials contain confidential commercial information providing technical data gathered and generated in connection with an internal investigation and conducted with outside consultants subject to confidentiality protections. ZF does not customarily release this information to the public, as it reveals competitive and commercially sensitive information. *See Critical Mass Energy Project v. NRC, et al.*, 975 F.2d 871, 879 (D.C. Cir. 1992). Protection of this information will further promote cooperation between NHTSA and industry, particularly suppliers, to identify and investigate potential safety risks. *See id.*

The submission includes data files provided in their original format, as requested by NHTSA, that cannot be marked. All of those files contain videos or raw data from testing conducted in the course of the investigation and include the term "Confidential" in the file name. ZF requests confidential treatment of all of the data contained in those files.

Based on the reasons provided herein, ZF requests confidential treatment of the materials for an indefinite period of time.

Please contact me with any questions.

Sincerely,

  
Natalia Medley

Enclosures: Hard drive with electronic files of complete submission marked confidential and with public redactions applied  
Certificate in Support of Request for Confidential Treatment

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