



March 11, 2025

VIA U.S. DOT SLFTS

Robert Nguyen
Safety Defect Engineer
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE

Washington, D.C. 20590

**Re: Request for Confidential Treatment for Supplemental Response to PE20-006
Information Request**

Dear Mr. Nguyen:

ZF North America, Inc. (“ZF NA”) submits this continuing request for confidential treatment of information contained in the attached materials. ZF NA seeks confidential treatment for the entire contents of the attached 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 NA re-submits this request at NHTSA’s direction and in connection with the attached materials, originally submitted in response to the agency’s request for information relating to Preliminary Investigation PE20-006. The attached materials do not fall within any of the class determinations included in appendix B to 49 CFR part 512. However, the data is confidential commercial information that, *inter alia*, identifies a supplier and customer for specifically identified components over the course of a specified time period. Public disclosure of that data would cause substantial competitive harm to ZF NA and its customers and suppliers. ZF NA does not, and ZF TRW did not, customarily release this information to the public, as it reveals competitive and commercially sensitive information. *See Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992). Protection of this information will further promote cooperation between NHTSA and industry on ongoing investigations. *See id.* For these reasons, ZF TRW requests confidential treatment of the information for an indefinite period of time pursuant to 49 CFR § 512.15(b)-(e).

Please contact either me or Art Foerster at Latham & Watkins LLP with any questions.

Regards,
/s/ Scott B. Paxton

Scott Paxton
Director, Legal Regulatory Counsel

cc: Daniel Rabinovitz (without enclosures)
Joshua Neff (without enclosures)
Ashely Simpson (without enclosures)

Enclosures: 1 copy of complete submission marked Confidential
1 copy of complete submission marked Confidential, with redactions applied
Certificate of Support in Request for Confidential Treatment of ZF NA