

Certificate in Support of Request for Confidentiality

I, Kevin Tilton, pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

- (1) I am a Project Manager for Commercial Vehicle Steering Systems for ZF Group, and I am authorized by ZF to execute documents on its behalf;
- (2) I certify that the information marked confidential and contained in the attached documents is confidential and proprietary data, is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4), and was originally submitted with the same claim;
- (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 ZF 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 ZF;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which ZF has claimed confidential treatment has never been released or become available outside ZF, except in the course of confidential business relationships;
- (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 ZF because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and
- (7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 5th day of March, 2025

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


Kevin Tilton

Project Manager, ZF Commercial Vehicle Steering Systems