



North American Subaru, Inc.
One Subaru Drive
Camden, NJ 08103
856-488-8500
[REDACTED]

July 18, 2022
Ref. No.: FSG22-004.1

Ms. Ann Carlson
Office of Chief Counsel, NCC
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

RE: Confidentiality Request: FSG22-004.1 IR Response EA21-002

Dear Ms. Ann Carlson,

Pursuant to 49 CFR Part 512, North American Subaru, Inc ("NASI"), on behalf of Subaru Corporation ("SBR") and Subaru of America, Inc. ("SOA"), hereby requests confidential treatment for the following information being submitted in accordance with EA21-002.

Specific information, including the confidentiality standard(s) under which the confidentiality request should be evaluated and the time period during which confidential treatment is sought, is provided below:

Subaru's submission in accordance with EA21-002 having the following file name:

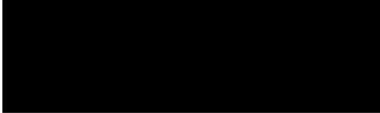
- Cover Letter v2 - Subaru Response re NHTSA Information Request EA21-002 [CONFIDENTIAL].pdf
- PRODUCTION DATA [CONFIDENTIAL].accdb
- EA21_002_SUBARU [CONFIDENTIAL].xlsx

Confidential treatment is requested for the information identified as CBI contained within these files. In NASI's opinion, this information should be evaluated under Part 512.15(d), "The information was provided to NHTSA voluntarily and was not customarily released to the public by the person from whom it was obtained."

Confidential treatment is requested on a permanent basis.

If you have any questions concerning this information, please give me a call at (856) 488-3476.

Sincerely,



Nick Aplin
Manager, Field Safety and Compliance
Attachments

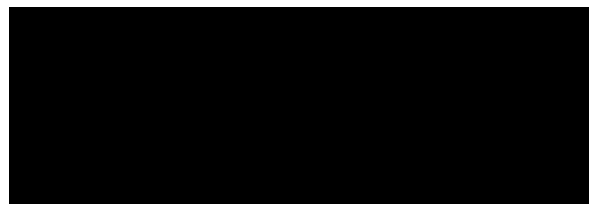
Enclosures: Certificate in Support of Request for Confidentiality, Information with CBI

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, Nick Aplin, pursuant to the provisions of 49 CFR 512, state as follows:

- (1) I am Nick Aplin, Manager, Field Safety and Compliance, and I am authorized by North American Subaru, Inc. ("NASI") to execute this certificate on its behalf;
- (2) I certify that the information contained in the files identified on page no. 1 of this request are 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 the statute under which the information is being submitted);
- (3) I hereby request that the information noted as confidential and contained in the files identified on page no. 1 of this request be protected for the period of time specified in the enclosed request for confidential treatment.
- (4) This certification is based on the information provided by the responsible NASI 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 SUBARU CORPORATION;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which NASI has claimed confidential treatment has never been released or become available outside of NASI;
- (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 NASI because of unauthorized or inadvertent disclosure; and
- (7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this the 18th day of July, 2022.



Manager, Field Safety and Compliance
North American Subaru, Inc.