

March 28, 2024

VIA EMAIL

Gina Gelement
Robert Bosch, LLC
38000 Hills Tech Drive
Farmington Hills, MI 48331

Subject: Information Request ID EA23-001

Ms. Gelement,

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened an Engineering Analysis (EA23-001) to investigate allegations of high pressure fuel pump internal failure in various model year (MY) vehicles manufactured by Fiat Chrysler Automobiles (FCA) and BMW of North America LLC (BMW) equipped with CP4 high pressure fuel pumps manufactured by Robert Bosch LLC (Bosch), and to request certain information.

This office has received several recalls from multiple vehicle manufacturers and 226 reports involving the internal failure of CP4 high pressure fuel pumps. Since summer 2021, FCA and BMW have filed 9 recalls involving high pressure fuel pump failures resulting in a loss of motive power; these include NHTSA recall numbers 21V-586, 21V-880, 21E-094, 22V-406, 22E-048, 22V-767, 22E-087, 23V-263, and 23E-032. The high pressure fuel pump equipped on the recalled vehicle population are variants of the CP4 pump, supplied by Bosch. A copy of the reports will be provided to you electronically for your review and information.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject component:** all CP4 high pressure fuel pump variants equipped on 2014-2018 BMW 328D, 2014-2016 BMW 535D, 2015 BMW 740LD, 2015-2017 BMW X3, 2014-2018 BMW X5, 2018 BMW 540D, 2019-2020 RAM 2500, 2019-2020 RAM 3500, 2019-2020 RAM 4500, 2019-2020 RAM 5500, 2014-2023 RAM 1500, 2014-2020 Jeep Grand Cherokee, 2021-2023 Jeep Gladiator, and 2020-2023 Jeep Wrangler.
- **Subject vehicles:** all vehicles equipped with subject component manufactured for sale or lease in the United States, including, but not limited to, the District of Columbia, and current U.S. territories and possessions. Note that this includes any vehicle equipped with the subject component and not exclusive to the vehicle list provided under *Subject Component*.
- **Alleged defect:** internal wear of subject component leading to wear particles entering the subject vehicle fuel flow.

- **Bosch:** Robert Bosch LLC, Robert Bosch GmbH, all of their past and present officers and employees, whether assigned to their principal offices or any of their field or other locations, including all of their divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Bosch (including all business units and persons previously referred to), who are or were involved in any way as of January 1, 2003, with any of the following related to the alleged defect in the subject vehicles:
 - a. Design, engineering, analysis, modification or production (e.g. quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, lawsuits or arbitrations; or
 - d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Document:** “Document(s)” is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Bosch, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to

production. In all cases where original and any non-identical copies are not available, “document(s)” also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by Bosch or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms “claim,” “consumer complaint,” “dealer field report,” “field report,” “fire,” “fleet,” “good will,” “make,” “model,” “model year,” “notice,” “property damage,” “property damage claim,” “rollover,” “type,” “warranty,” “warranty adjustment,” and “warranty claim,” whether used in singular or in plural form, have the same meaning as found in 49 C.F.R. § 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Bosch has previously provided a document to ODI, Bosch may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Bosch’s response to each request, identify the source of the information and indicate the last date the information was gathered. If the information below does not exist or is not applicable, state so in the response.

1. State the number of subject components Bosch has manufactured for subject vehicles or as replacement parts. Separately, for each subject component manufactured to date by Bosch, state the following:
 - a. Vehicle identification number (17-character VIN) of recipient vehicle;
 - b. Make of recipient vehicle;
 - c. Model of recipient vehicle;
 - d. Model Year of recipient vehicle;
 - e. Whether it was installed as original equipment or as replacement part;
 - f. Part number and design version/variant;
 - g. Part serial number or other identifying mark;
 - h. Date of manufacture of subject component (MM/DD/YYYY); and
 - i. Date warranty coverage commenced of subject component (MM/DD/YYYY).

Provide the information in Microsoft Access 2010, or a compatible format, entitled “PRODUCTION DATA.” A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

2. State the number of each of the following, received by Bosch or original equipment manufacturer (OEM) of subject vehicles, or of which Bosch is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:
 - a. Consumer or original OEM customer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury or fatality;
 - d. Property damage claims;
 - e. Third-party arbitration proceedings, both pending and closed, where Bosch is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which Bosch is or was a defendant or codefendant.

For subparts “a” through “f” state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items “c” through “f” provide a summary description of the alleged problem and causal and contributing factors and Bosch’s assessment of the problem, with a summary of the significant underlying facts and evidence. For items “e” and “f” identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
 - a. Bosch’s file number or other identifier used;
 - b. Whether the report was initially received by Bosch or OEM (if OEM, provide name);
 - c. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - d. Vehicle owner, customer, or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
 - e. Vehicle owner, customer, or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
 - f. Vehicle’s 17-character VIN;
 - g. Vehicle’s make, model and model year (please use distinct fields for each data type);
 - h. Vehicle’s mileage at time of incident (numeric data type);
 - i. Incident date (MM/DD/YYYY);
 - j. Report or claim date (MM/DD/YYYY);
 - k. Whether a loss of motive power is alleged;
 - l. Whether a crash is alleged;
 - m. Whether property damage is alleged;
 - n. Number of alleged injuries, if any; and
 - o. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled “REQUEST NUMBER TWO DATA.” A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Bosch used for organizing the documents. Describe in detail the search methods and search criteria used by Bosch to identify the items in response to Request No. 2.
5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Bosch to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Bosch’s claim number;
- b. Vehicle owner, customer (OEM or otherwise), or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
- c. Vehicle owner, customer (OEM or otherwise), or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
- d. 17-character VIN;
- e. Vehicle’s make/model/model year (please use distinct fields for each data type);
- f. Repair date (MM/DD/YYYY);
- g. Vehicle mileage at time of repair (numeric data type);
- h. Repairing dealer’s or facility’s name, telephone number, city and state or ZIP code (please use distinct fields for each data type);
- i. Problem code(s) and/or diagnostic trouble code(s);
- j. Replacement part number(s) and description(s);
- k. Concern stated by customer;
- l. Whether customer alleges a loss of motive power;
- m. Whether subject component was evaluated/analyzed by Bosch;
- n. Root cause of subject component malfunction;
- o. Cause as stated on the repair order;
- p. Correction as stated on the repair order; and
- q. Additional comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2010, or a compatible format, entitled “WARRANTY DATA.” A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

6. Describe in detail the search methods and search criteria used by Bosch to identify the claims in response to Request No. 5, including the, problem codes and/or diagnostic trouble codes, part numbers and any other pertinent parameters used.

7. Provide a list of all, problem codes, and problem code descriptions, diagnostic trouble codes and diagnostic trouble code descriptions applicable to the alleged defect in the subject vehicles. State whether the diagnostic trouble codes are automatically reported to the warranty database electronically or manually entered into the warranty database by a claims administrator.
8. State, by make and model year, the terms of the new vehicle warranty coverage offered by Bosch on the subject vehicles and/or subject components (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Bosch offered for the subject vehicles and/or subject components and state by option, model, and model year, the number of vehicles and components that are covered under each such extended warranty.
9. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Bosch has issued to any customer OEMs, dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Bosch is planning to issue within the next 120 days.
10. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles or subject components that have been conducted, are being conducted, are planned, or are being planned by, or for, Bosch. For each such action, provide the following information:
 - a. Action title or identifier;
 - b. The actual or planned start date;
 - c. The actual or expected end date;
 - d. Brief summary of the subject and objective of the action;
 - e. Engineering group(s) responsible for designing and for conducting the action; and
 - f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action. Group all documents related to returned parts analyses/actions into a separate folder. Provide a spreadsheet summarizing the actions related to the returned parts, to include the following in separate columns; identifier, pump variant/subvariant, donor vehicle make/model/model year, mileage, location, whether a loss of motive power was alleged, description of how they were analyzed, reason for specific component analysis, and most likely cause of part malfunction.

11. Describe all modifications or changes made by, or on behalf of, Bosch in the design, material composition, manufacture, quality control, supply, or installation of the subject components,

from the start of production to date, which relate to, or may relate to, the alleged defect. For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into production;
- b. A detailed description of the modification or change;
- c. The reason(s) for the modification or change;
- d. The part number(s) (service and engineering) of the original component;
- e. The part number(s) (service and engineering) of the modified component;
- f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
- g. When the modified component was made available as a service component; and
- h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Bosch is aware of which may be incorporated into vehicle production within the next 120 days.

12. Provide all documents and communications between Bosch and supplied OEMs related to the alleged defect in the subject vehicles. Organize the documents in chronological order.
13. Provide all documents and communications transmitted internally within Bosch that relate to the alleged defect in the subject vehicles. Organize the documents in chronological order.
14. Provide a summary of sales of the subject component, or components of substantially similar design, to OEMs and aftermarket. Organize your answer by purchaser, production month, pump variant, and make/model/model year, if applicable. For each separate purchaser provide contact information: Company name, contact person, phone number, and email address.
15. Provide production and assembly drawings, diagrams, schematics, or similar, (including all revisions and revision history) that describe dimensional information of subject component variants, including but not limited to the following internal subcomponents/internal structures:
 - a. Cams;
 - b. Rollers;
 - c. Roller shoes;
 - d. Filters;
 - e. Fluid passageways/valves;
 - f. Pistons;
 - g. Seals/gaskets; and
 - h. Gears.
16. Provide information concerning the subject component, to include the following:
 - a. Design standards, specifications, or guidelines involving fuel quality characteristics;
 - b. Failure Mode and Effects Analysis (FMEA), or similar, related to the alleged defect; and

- c. Design Verification Plan and Report (DVP&R), or similar qualification report, for the subject component.
17. Provide a detailed chronology of all events relating to the alleged defect in the subject vehicles, from initial detection to the date of this Information Request letter.
 18. In reference to recall 22V406 Part 573 submitted by FCA,
 - a. Which 'internally failed component' within the subject component introduced debris into the fuel system?
 - i) What physical process caused these internal components to introduce debris into the fuel system?
 - (1) What was the cause of this physical process?
 - b. Provide an assessment of factors that can cause the subject component to introduce debris into the fuel system.
 19. Furnish Bosch's assessment of the alleged defect in the subject vehicles, including:
 - a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s);
 - d. The risk to motor vehicle safety that it poses; and
 - e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring, or subject component was malfunctioning; and
 - f. The reports included with this inquiry.
 20. Furnish a copy of all documents not specifically requested herein, which Bosch believes are relevant to, or which were used in formulating its assessment of, the alleged defect in the subject vehicles.

Legal Authority for This Request

This letter is being sent to Bosch pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports. It constitutes a new request for information.

Civil Penalties

Bosch's failure to respond promptly and fully to this letter could subject Bosch to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) The Vehicle Safety Act, 49 U.S.C. § 30165(a)(3), provides for civil penalties of up to \$27,168 per violation per day, with a maximum of \$135,828,178 for a related series of daily violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. *See* 49 C.F.R. § 578.6(a)(3). This includes failing to respond completely, accurately, or in a timely manner to ODI information requests.

If Bosch cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Bosch does not submit one or more requested documents or items of information in response to this information request, Bosch must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Confidential Business Information

If Bosch's response contains any information that you claim is confidential business information, Bosch must request two secure electronic file transfer links from Daniel Pinero-Espinoza at daniel.pinero@dot.gov. One secure electronic file transfer link is for your request for confidential treatment and will be directed to NHTSA's Office of the Chief Counsel. Please see enclosure 2 for additional instructions on submitting a request for confidential treatment that is compliant with 49 C.F.R. Part 512 (specifically, a request for confidential treatment must include the four required parts that are discussed in enclosure 2). The second secure electronic file transfer link is for your non-confidential response to this letter. Do not submit any confidential business information along with your non-confidential submission. Please refer to EA23-001 in Bosch's response to this letter and in a request for confidential treatment that Bosch may submit.

Due Date

Bosch's response to this letter must be submitted to this office by *May 10, 2024*. If Bosch finds that it is unable to provide all of the information requested within the time allotted, Bosch must request an extension from me at (202) 366-5677 no later than five business days before the response due date. If Bosch is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Bosch then has available, even if an extension has been granted.

If you have any technical questions concerning this matter, please call Daniel Pinero Espinoza of my staff at (202) 366-5677.

Sincerely,

A handwritten signature in black ink that reads "Bruce York". The signature is written in a cursive, flowing style.

Bruce York Chief
Vehicle Defects Division B
Office of Defects Investigation

Enclosure 1, The subject reports referenced in the introduction of this letter may be viewed at the NHTSA.gov website using the following ODI reference numbers: 10730676, 10759857, 10994140, 11001775, 11010637, 11014098, 11034439, 11039258, 11040899, 11043366, 11051571, 11051634, 11078257, 11082066, 11109988, 11112799, 11133080, 11151076, 11151823, 11166168, 11170627, 11183985, 11217811, 11233977, 11256481, 11277714, 11280695, 11325197, 11351165, 11351441, 11361616, 11365300, 11365426, 11365858, 11366401, 11372337, 11374797, 11376793, 11377871, 11378173, 11384377, 11386063, 11387018, 11399710, 11415339, 11418868, 11418870, 11427075, 11428809, 11429454, 11431757, 11434276, 11435138, 11435141, 11435896, 11436188, 11436807, 11437226, 11437249, 11437273, 11437292, 11437294, 11437394, 11437399, 11437423, 11437506, 11437528, 11437565, 11437579, 11437580, 11437679, 11437744, 11437781, 11437842, 11437993, 11438006, 11438121, 11438138, 11438155, 11438282, 11438429, 11438629, 11439243, 11439281, 11439359, 11439879, 11440397, 11441403, 11441756, 11443277, 11444620, 11446542, 11447205, 11448038, 11448163, 11448546, 11449764, 11453406, 11453535, 11453556, 11457249, 11457703, 11459416, 11461749, 11466197, 11466248, 11467555, 11468562, 11469337, 11469580, 11470568, 11470916, 11473496, 11474540, 11474607, 11475051, 11475354, 11478155, 11480677, 11482745, 11483119, 11486913, 11488110, 11488326, 11489096, 11489674, 11490063, 11491389, 11491812, 11491985, 11492082, 11494666, 11496682, 11497093, 11498729, 11498866, 11499998, 11503517, 11503591, 11503821, 11505496, 11506981, 11508183, 11510389, 11510667, 11514462, 11514705, 11515960, 11516548, 11517497, 11517854, 11520475, 11522384, 11523361, 11524735, 11524815, 11526623, 11527096, 11527255, 11527275, 11529430, 11529768, 11530615, 11530763, 11531418, 11531527, 11535762, 11536265, 11536535, 11536836, 11537142, 11537979, 11540663, 11540735, 11541011, 11541343, 11541409, 11541470, 11542109, 11543211, 11544001, 11544110, 11544184, 11544831, 11545038, 11546397, 11546427, 11547385, 11547724, 11548242, 11549169, 11550513, 11550910, 11551326, 11551370, 11551464, 11551492, 11553378, 11554116, 11554950, 11556045, 11556135, 11556393, 11556500, 11556921, 11557835, 11559595, 11559851, 11560066, 11560260, 11561366, 11561634, 11562702, 11566983, 11571016, 11571917, 11573123, 11573255, 11573911, 11574338, 11574704, 11575357, 11576292, 11577391, 11578818, 11579254

Enclosure 2, Information for Requests for Confidential Treatment.

ENCLOSURE – INFORMATION FOR REQUESTS FOR CONFIDENTIAL TREATMENT

If you believe that your response contains any material that you claim is confidential business information, submit these materials to NHTSA's Office of the Chief Counsel in accordance with 49 C.F.R. Part 512. **All requests for confidential treatment must be submitted directly to the Office of the Chief Counsel. Upon request, ODI will provide you with a secure file transfer link for your submission to the Office of the Chief Counsel.**

Requests for confidential treatment are governed by Part 512. A current version of this regulation is available on the internet at <http://www.ecfr.gov> by selecting Title 49 "Transportation," selecting "Parts 500 – 599" and then selecting Part 512 "Confidential Business Information."

How to request confidential treatment:

NHTSA is currently treating electronic submission as an acceptable method for submitting confidential business information to the agency under Part 512. If you claim that any of the information or documents provided in your response constitutes confidential business information within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, you must request a secure file transfer link from the ODI contact listed in your Information Request. ODI will copy a representative from the Office of the Chief Counsel on the secure file transfer link for your request for confidential treatment. You must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with Part 512, to the Office of the Chief Counsel. Do not send a hardcopy of a request for confidential treatment to NHTSA's headquarters.

Your request must include a request letter that contains supporting information, pursuant to Part 512.8. Your request must also include a certificate, pursuant to Part 512.4(b) and Part 512, Appendix A.

You are required to submit one unredacted "confidential version" of the information for which you are seeking confidential treatment. Pursuant to Part 512.6, the words "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" or "CONFIDENTIAL BUSINESS INFORMATION CONTAINED WITHIN BRACKETS" (as applicable) must appear at the top of each page containing information claimed to be confidential. In the latter situation, where not all information on the page is claimed to be confidential, identify each item of information for which confidentiality is requested within brackets: "[]."

You are also required to submit one redacted "public version" of the information for which you are seeking confidential treatment. Pursuant to Part 512.5(a)(2), the redacted "public version" should include redactions of any information for which you are seeking confidential treatment (i.e., the only information that should be unredacted is information for which you are **not** seeking confidential treatment).

For questions about a request for confidential treatment, please contact Dan Rabinovitz in the Office of the Chief Counsel at Daniel.Rabinovitz@dot.gov or (202)366-8534.