Kia America, Inc.
Corporate Headquarters
111 Peters Canyon Road, Irvine, CA 92606-1790 USA

VIA ELECTRONIC SUBMISSION

October 23, 2023

John Donaldson, Acting Chief Counsel
Office of the Chief Counsel (NCC-100)
National Highway Traffic Safety Administration
West Building, W41-326
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: Request for Confidential Treatment of Information Submitted in Response to PE23-012 (Reduced/Complete Loss of Motive Power Due to ICCU Failure (MY) 2022 Kia EV6)

Dear Mr. Donaldson:

On behalf of Kia America, Inc. and Kia Corporation (collectively "Kia"), Kia America, Inc. ("KUS") hereby requests that certain documents submitted in its response to PE23-012 dated October 23, 2023 be treated as confidential. Pursuant to NHTSA's guidelines, Kia is submitting its request and associated documents via electronic submission. In accordance with 49 C.F.R. 512.3(c), confidential business information includes trade secrets or commercial or financial information that is privileged or confidential as described in the Freedom of Information Act. See 5 U.S.C. 522(b)(4). Commercial information is considered confidential if it has not been publicly disclosed and if its release is likely to cause substantial harm to Kia's competitive position. 49 C.F.R. 512.3.

The documents for which Kia is seeking confidentiality were prepared by Kia or on its behalf and contain design, testing, engineering specification information and evaluations that it claims is confidential business information. These documents include the following:

- Summary chart in response to Request No. 1 (TAB A) and supporting documents (TABS A.1 through A.6);
- Modifications summary chart in response to Request No. 2 (TAB B);
- Document submitted in response to 5(a) (TAB 5.A)
- Document submitted in response to 5(b) (TAB 5.B);
- Document submitted in response to 5(c) (TAB 5.C);
- Documents submitted in response to 5(d) (TAB 5.D);
- Documents submitted in response to 5(e) (TABS 5E.1—5E.52); and

- Documents submitted in response to 5(f) (TAB 5F);

These documents were prepared by Kia or on its behalf and contain both trade secrets and/or confidential information that, if made public, would cause substantial harm to Kia's competitive position in the market, which, if disseminated, would allow Kia's competitors the benefit of knowing its design, specifications, testing and evaluations.

If you have any questions or if you need anything further, please do not hesitate to contact me.

Sincerely,

Jurassic park (Oct 23, 2023 15:28 PDT)

J.S. (Jurassic) Park
Vice President, Chief Safety Officer

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, J.S. (Jurassic) Park, pursuant to the provisions of 49 CFR Part 512, state as follows:

(1) I am the Vice President, Chief Safety Officer for Kia North America ("Kia NA") and I am authorized by Kia America, Inc. ("KUS") and Kia Corporation ("Kia HQ") to execute this certificate on their behalf;

(2) I certify that the documents being submitted by KUS and Kia HQ (hereinafter collectively referred to as "Kia"), is confidential and proprietary data and is being submitted with the claim that they are entitled to confidential treatment under 5 U.S.C. 552(b)(4) (as incorporated by reference in and modified by statute under which the information is being submitted);

(3) I hereby request that the following documents submitted in its response to PE23-012 dated October 23, 2023 be treated as confidential and be protected on a permanent basis:

- Summary chart in response to Request No. 1 (TAB A) and supporting documents (TABS A.1 through A.6);
- Modifications summary chart in response to Request No. 2 (TAB B);
- Document submitted in response to 5(a) (TAB 5.A)
- Document submitted in response to 5(b) (TAB 5.B);
- Document submitted in response to 5(c) (TAB 5.C);
- Documents submitted in response to 5(d) (TAB 5.D);
- Documents submitted in response to 5(e) (TABS 5E.1—5E.52); and
- Documents submitted in response to 5(f) (TAB 5F);

(4) This certification is based on the information provided by the responsible Kia 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 Kia;

(5) Based upon that information, to the best of my knowledge, information and belief, the information for which Kia has claimed confidential treatment has never been released or become available outside Kia; except for disclosures to manufacturers, customers and suppliers of the companies, who were provided the information with the understanding that such information must be maintained in confidence;

(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 Kia 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 23rd day of October 2023.

Kia North America

By: Jurassic park (Oct 23, 2023 15:28 PDT)

J.S. (Jurassic) Park, Vice President,
Chief Safety Officer