



U.S. Department of Transportation  
National Highway Traffic Safety  
Administration



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March 12, 2025

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800 Chrysler Drive  
CIMS 482-00-83  
Auburn Hills, MI 48326

Subject: Information Request ID PE24024-01

Ms. Jennifer Allman:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Preliminary Evaluation (PE24024) to investigate allegations of engine compartment fires in certain model year (MY) 2021-2023 Jeep Wrangler and Gladiator vehicles manufactured by Fiat Chrysler Automobiles (FCA), and to request certain information.

This office has received 15 reports of engine compartment fires in certain 2021-2023 Jeep Wrangler and Gladiator vehicles. ODI has learned from FCA of several thermal events originating at or near the power steering pump electrical connector in recent model year Jeep Wrangler and Gladiator vehicles. The connector is located at the passenger front side of the engine compartment, coinciding with the majority of reported fire origins known to ODI. A list of the subject reports referenced in this letter are provided in Enclosure 2.

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

- **Subject vehicles:** all 2021-2023 Jeep Wrangler and Gladiator vehicles 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.
- **Peer vehicles:** all 2019-2020 Jeep Wrangler and Gladiator vehicles 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.

- **Subject component(s)**: Power steering pump module, including all power steering pump electrical connectors and associated wiring
- **Alleged defect**:
  - a. Fire or thermal event occurring at or near the subject component(s);
  - b. Fire or thermal event that appear to have originated in the engine compartment while the vehicle was not operating (ignition off, accessory (ACC) off, or key-off) and not related to Recall 24V720 or Recall 23V787.
- **FCA**: Fiat Chrysler Automobiles, 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 FCA (including all business units and persons previously referred to), who are or were involved in any way since January 1, 2011, with any of the following related to the alleged defect in the subject and peer 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 FCA, 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 FCA 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 FCA has previously provided a document to ODI, FCA 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 FCA's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. State, by model and model year, the number of subject and peer vehicles FCA has manufactured for sale or lease in the United States. Separately, for each subject and peer vehicle manufactured to date by FCA, state the following:
  - a. Vehicle identification number (17-character VIN);
  - b. Make;
  - c. Model;
  - d. Model Year;
  - e. Engine displacement;

- f. Subject component part number and design version installed as original equipment;
- g. Plant location;
- h. Date of manufacture (MM/DD/YYYY);
- i. Date warranty coverage commenced (MM/DD/YYYY); and
- j. The State in the United States where the vehicle was originally sold or leased, or delivered for sale or lease (postal abbreviation).

If multiple subject components exist, provide a separate field for each component. If subject components are not associated with a specific VIN, estimate based on the subject component usage start date.

Provide the table 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 FCA, or of which FCA is otherwise aware, which relate to, or may relate to, the alleged defect in the subject and peer vehicles:
  - a. Consumer complaints, including those from fleet operators;
  - b. Field reports, including dealer field reports;
  - c. Reports involving a crash, injury or fatality;
  - d. Reports involving a fire or thermal event;
  - e. Property damage claims; and
  - f. Third-party arbitration proceedings, both pending and closed, where FCA is or was a party to the arbitration; and
  - g. Lawsuits, both pending and closed, in which FCA is or was a defendant or codefendant.

For subparts "a" through "g," 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 "g," provide a summary description of the alleged incident, to include description and ages of alleged injuries/fatalities, vehicle location within or outside structure, time of the fire or thermal event, estimated amount of property damage, causal and contributing factors, and FCA's assessment of the incident, with a summary of the significant underlying facts and evidence. For items "f" and "g," identify the parties to the action, as well as the caption, court, docket number, description of resolution (if closed), date on which the complaint or other document initiating the action was filed, and provide any associated documents containing objective, analytical, or technical information.

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. FCA's file number or other identifier used;
  - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
  - c. Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
  - d. Vehicle owner or fleet street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
  - e. Vehicle's 17-character VIN;
  - f. Vehicle's make, model and model year (please use distinct fields for each data type);
  - g. Vehicle's mileage at time of incident (numeric data type);
  - h. Incident date (MM/DD/YYYY);
  - i. Report or claim date (MM/DD/YYYY);
  - j. Whether a crash is alleged;
  - k. Whether a fire is alleged;
  - l. Whether a thermal event is alleged;
  - m. The vehicle operating conditions when the fire or thermal event was first detected;
  - n. The area of origin of the fire or thermal event (e.g., upper-left hand engine compartment), state the specific components at the origin, if known;
  - o. The alleged cause of the fire or thermal event;
  - p. A summary of all vehicle modifications or service factors OEM believes could have caused or contributed to the incident;
  - q. Whether FCA or FCA contractor/consultant investigated the incident;
  - r. FCA or FCA contractor/consultant assessment of the most likely cause of the fire or thermal event;
  - s. Whether CT scans, X-ray imagery, or similar imagery were acquired;
  - t. Whether video of the incident exists;
  - u. Diagnostic trouble codes or other codes present on the vehicle after the fire or thermal event, if available;
  
  - v. Whether property damage is alleged;
  - w. Number of alleged injuries, if any;
  - x. Number of alleged fatalities, if any; and
  - y. Whether vehicle was repurchased by FCA.

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 FCA used for organizing the documents. Describe in detail the search methods and search criteria used by FCA to identify the items in response to Request No. 2. 'For each vehicle identified in the responsive data to Request No. 2,

provide a complete dealer service history within 6 months of (before and after) the alleged incident or report date (whichever is earliest) and report close date.'

5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by FCA to date that relate to, or may relate to, the alleged defect in the subject and peer 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. FCA's claim number;
- b. Vehicle owner or fleet name (and fleet contact person), email address and telephone number (please use distinct fields for each data type);
- c. Vehicle owner 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 and 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. Labor operation number(s);
- j. Problem code(s);
- k. Diagnostic trouble code(s);
- l. Replacement part number(s) and description(s);
- m. Concern stated by customer;
- n. Cause as stated on the repair order;
- o. Correction as stated on the repair order;
- p. Additional comments, if any, by dealer/technician relating to claim and/or repair; and
- q. Whether vehicle was repurchased by FCA.

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 FCA to identify the claims in response to Request No. 5, including the labor operations, problem codes, diagnostic trouble codes, part numbers and any other pertinent parameters used.
7. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions, diagnostic trouble codes and diagnostic trouble code descriptions applicable to the alleged defect in the subject and peer 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 FCA on the subject and peer vehicles (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 FCA offered for the subject and peer vehicles and state by option, model, and model year, the number of vehicles 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 *or subject component(s)* in the subject and peer vehicles, that FCA has issued to any 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. If FCA has drafted any such communications, furnish a copy of the draft. Also include the latest draft copy of any communication that FCA 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 that have been conducted, are being conducted, are planned, or are being planned by, or for, FCA. 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)/supplier(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.

11. Describe all modifications or changes made by, or on behalf of, FCA in the design, material composition, manufacture, quality control, supply, or installation of the subject component(s), from the start of production to date. 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 vehicle 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 FCA is aware of which may be incorporated into vehicle production within the next 120 days.

12. State the number of each of the following that FCA has sold that may be used in the subject and peer vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):
  - a. Subject component(s); and
  - b. Any kits that have been released, or developed, by FCA for use in service repairs to the subject component(s)/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which FCA is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

13. Regarding acquisition of known subject components possibly related to the alleged defect; state the number of each of the following currently in FCA's possession:
  - a. Exemplar subject components that are available for purchase by NHTSA;
  - b. Subject components related to the alleged defect; and
  - c. Subject or peer vehicles that have experienced the alleged defect.
14. Provide quarterly updates to Requests 2 through 6 until the publication of the closing resume of PE24024.
15. Provide circuit diagrams of the electrical circuit that contains the subject component(s). Include a description of the other components that are powered on the same circuit. Provide for each subject component variant on the subject vehicles, if applicable.
16. Include the schematic of the wiring harness(es) that contain any wiring connected to the subject component(s). Include labels and gauge for each wire. Provide for each engine compartment variant of the subject vehicles, if applicable.
17. Describe the electrical and thermal fault protection used in the subject component circuit and state the gauge and nominal and maximum currents of each wire. Provide for each subject component variant on the subject vehicles, if applicable.
18. Provide diagrams that show the location of the power steering pump module, power steering pump connector, associated wires and wiring harness, and 12-volt battery within

the engine compartment of the subject vehicles. Provide diagrams for each engine compartment variant.

19. Identify all components in the subject vehicle engine compartment that receive electrical power when the ignition state is in the 'off' position. Identify the location of each applicable component in the engine compartment and provide their electrical layout (include physical location of component and wires, in addition to wiring diagram).
20. Separately, for each vehicle identified in FCA's response to Requests Nos. 3(y) and 5(q) provide FCA's reason for the repurchase of the vehicle. Identify any tests, studies or assessments performed on the vehicles repurchased by FCA. For each item identified, provide copies of all documents related to the item, regardless of whether the documents are in interim, draft, or final form. In addition, provide all documents and correspondence related to each vehicle repurchased by FCA.
21. Describe how FCA first became aware of alleged defect Part 'a' in the subject vehicles and state the date on which FCA first became aware of the alleged defect. Provide a detailed chronology of all events regarding Part 'a' of the alleged defect in the subject vehicles, starting from the time FCA first became aware of this issue to the date of this Information Request letter.
22. For *each* subject or peer vehicle engine thermal event where the area around the steering pump has been identified as the possible origin (Alleged defect Part 'a'), answer the following:
  - a. Describe why FCA believes the steering pump is the origin;
  - b. Describe the manner in which the steering pump failed;
  - c. State whether the vehicle was occupied at the time of the thermal event;
  - d. If the vehicle was stored inside a garage or adjacent to a structure, state if the structure caught fire or was damaged as a result of the thermal event and whether that structure was occupied at the time of the thermal event.
23. FCA presented information to NHTSA on a series of Wrangler fires with an apparent origin in the engine compartment. At this meeting, FCA presented charts with the only specific origin listed as occurring at the subject component. Provide the following regarding internal activities involving the power steering pump and alleged defect Part 'a' or otherwise stated:
  - a. A description of FCA's general investigative process, starting from when FCA has learned of a new vehicle incident through to the final determination and disposition;
  - b. A summary that explains how FCA determined the power steering pump connector as the origin and likely cause, as identified in the presentation;
  - c. A detailed description of FCA's investigation of non-crash engine compartment fires or thermal events in the subject and peer vehicles involving the subject component(s) to date, including a schedule for completing all ongoing and planned actions;

- d. All causal factors that FCA has considered thus far in its investigation, including any that FCA has eliminated, and describe the evidence that FCA has collected and analyzed for each;
  - e. The incident rates and trends of non-crash engine compartment fires or thermal events in the subject vehicles and peer vehicles, both collectively and for any specific causal factors identified in response to 23(d);
  - f. Potential for future occurrences of such fire or thermal events caused by the subject component;
    - 1. Provide a Weibull analysis or similar, if available;
    - 2. State the number of related failures that are likely to occur for the subject vehicles in 1 year, 3 years, 5 years, and 10 years. Include the percentage of failures that are likely to occur while the vehicle is turned off or unoccupied for each time interval if available.
  - g. A description and discussion of the mechanisms preventing other similar incidents from occurring on vehicles equipped with similar power steering pump module; and
  - h. State how FCA has determined that the fire or thermal events resulting from a common failure in the steering pump does not constitute an unreasonable risk to motor vehicle safety.
24. Furnish FCA's assessment of the alleged defect in the subject and peer vehicles addressing alleged defect 'a' and 'b' separately. Include the following:
- a. The causal or contributory factor(s);
  - b. The failure mechanism(s);
  - c. The failure mode(s);
  - d. If the information requested in a-c are not known by FCA, describe all completed, ongoing and planned actions to determine that information;
  - e. The risk to motor vehicle safety that it poses;
  - f. 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 any subject component was malfunctioning; and
  - g. The reports included with this inquiry.

### **Legal Authority for This Request**

This letter is being sent to FCA 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**

FCA's failure to respond promptly and fully to this letter could subject FCA 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 FCA cannot respond to any specific request or subpart(s) thereof, please state with sufficient detail in the corresponding narrative the reason why it is unable to do so. Redactions within a document containing responsive information are not permitted in the normal course. If on the basis of attorney-client, attorney work product, or other privilege, FCA does not submit one or more requested documents or items of information in response to this information request, FCA 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 FCA's response contains any information that you claim is confidential business information, FCA must submit its request for confidential treatment and any files containing CBI to NHTSA's Office of the Chief Counsel Via the CBI Portal or a secure electronic file transfer link. Please see enclosure 1 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 1).

If you choose not to submit your request for confidential treatment and any files containing CBI directly to NHTSA's Office of the Chief Counsel via the CBI Portal, please notify the investigator referenced in this IR to ensure that the secure file transfer link for your request for confidential treatment and any files containing CBI are directed to the Office of the Chief Counsel accordingly.

In addition to submitting a request for confidential treatment and any files containing CBI directly to NHTSA's Office of the Chief Counsel, FCA must submit a copy of its request for confidential treatment and any files containing CBI directly to ODI via the Safety Defect Investigations (SDI) Portal. For each file submitted through the SDI Portal where CBI is being requested, FCA must check the "Contains CBI" box. In addition, FCA, must submit a redacted version of each file for which CBI is being requested. The requests for confidential treatments and certification documents are not considered confidential so these documents should not be marked as "Contains CBI".

Please refer to PE24024-01 in FCA's response to this letter and in the request for confidential treatment that FCA may submit.

**Due Date**

FCA's to this letter must be submitted to this office by April 25, 2025. If FCA finds that it is unable to provide all of the information requested within the time allotted, FCA must request an extension from me at (202) 366-5677 no later than five business days before the response due date. If FCA 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 FCA 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,

*Bruce York*

Bruce York, Chief  
VDD-B Division  
Office of Defects Investigation

Enclosure 1, Information for Requests for Confidential Treatment.

Enclosure 2, The subject reports referenced in the introduction of this letter may be viewed at the NHTSA.gov website using the following ODI reference numbers: 11403621, 11436759, 11442560, 11567979, 11570607, 11573476, 11576144, 11585273, 11613951, 11617119, 11617525, 11621193, 11633817, 11636109, 11640205.

## ENCLOSURE 1 - 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 via the Confidential Business Information (CBI) Portal or a secure file transfer link for your submission addressed to the Office of the Chief Counsel. If you are not currently registered for the CBI Portal, you may send a registration request to [cbi-helpdesk@dot.gov](mailto:cbi-helpdesk@dot.gov). In addition to directly submitting the files to the Office of the Chief Counsel, you will also need to submit a copy of your request and files containing CBI directly to ODI through the Safety Defect Investigations (SDI) Portal.**

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](mailto:Daniel.Rabinovitz@dot.gov) or (202)366-8534.