

**Certificate in Support of Request for Confidentiality**

I, Jeffrey Rosso, pursuant to the provisions of 49 CFR part 512, state as follows:

(1) I am Jeffrey Rosso, Senior Engineer Manager North America Seatbelt Systems, for ZF Passive Safety Systems ("ZF"), and I am authorized by ZF to execute this certificate on its behalf.

(2) I certify that the information contained in the technical documents and communications submitted with this certification is confidential and proprietary data 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). Specifically, the documents contain proprietary trade secret data concerning a seatbelt system (the "component"). The component has been sold to Ford, among other motor vehicle manufacturers, for use in motor vehicles. The documents also reflect the materials used in the manufacture of that component. The design and other information reflected in the documents is the product of the creative efforts of ZF engineers. Public disclosure of this design information would cause competitive harm to ZF.

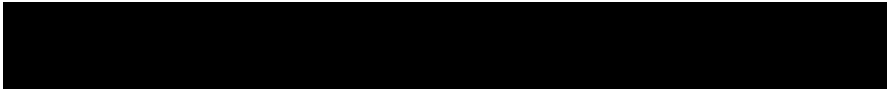
(3) I hereby request that the information contained in the documents be protected for a period of ten years. ZF still manufactures for automotive use the component to which the documents relate.

(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 of 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 suppliers of the material used in the manufacture of the component by ZF under circumstances such that the shared information is retained as confidential by those suppliers and to the best of my knowledge has not been shared with other persons or entities.

(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.

(7) I certify under penalty of perjury that the foregoing is true and correct.  
Executed on this 27 day of Jan, 2025 .

  
Jeffrey Rosso  
Senior Engineer Manager North America  
Seatbelt Systems  
ZF Passive Safety Systems