

Certificate in Support of Request for Confidentiality

NHTSA File No. RQ24-015

I, Karl Einstein, pursuant to the provisions of 49 CFR part 512, certify as follows:

1. I am the Director of Quality Assurance for Daicel Safety Systems Americas ("DSSA"), and I am authorized by DSSA to execute this certificate on its behalf.
2. I certify that the information contained in the two February 13, 2024 documents ("the documents") submitted with this certification as Exhibits A and B are 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 commercially sensitive and proprietary trade secret data concerning the design and manufacture of DSSA's micro-gas generators ("MGG"). DSSA has sold MGGs to ZF Passive Safety US, Inc. for use in motor vehicles. The documents also reflect the materials used in the manufacture of the MGGs. The design and other information reflected in the documents are the product of the creative efforts of DSSA's engineers. Public disclosure of this design information would cause competitive harm to DSSA.
3. I hereby request that the information contained in the documents be protected for a period of ten years. DSSA still manufactures MGGs for automotive use to which the documents relate.
4. This certification is based on the information provided by the responsible DSSA 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 DSSA.

5. Based upon that information, to the best of my knowledge, information and belief, the information for which DSSA has claimed confidential treatment has never been released or become available outside DSSA, except suppliers of the material used in the manufacture of MGGs by DSSA 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 DSSA.

7. I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 27th day of January



Karl Einstein