



June 18, 2025

SENT ELECTRONICALLY

Mr. Tom Single, Global Assistant Director Automotive Safety Office Ford Motor Company 330 Town Center Drive Suite 500 Dearborn, MI 48126

Subject: Information Request ID EA25001-01

Dear Mr. Single:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) is conducting an Engineering Analysis (EA25001) to investigate collisions involving Ford BlueCruise, a partial driving automation system. The office is currently aware of four frontal collisions, including two that resulted in fatalities, involving Ford Mustang Mach-E vehicles equipped with BlueCruise. As part of this investigation, this letter seeks certain information from Ford regarding the BlueCruise system equipped in these vehicles and other vehicles manufactured by Ford. NHTSA previously sent an Information Request on June 4, 2024, during the Preliminary Evaluation stage of this investigation (PE24012). On January 17, 2025, NHTSA upgraded the investigation to an Engineering Analysis (EA) to further investigate system limitations of BlueCruise and to evaluate drivers' ability to respond to scenarios that exceed the system's limitations. This is the first Information Request issued to Ford in the EA stage of the investigation.

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

- **Subject Vehicles:** All model year (MY) 2021-2025 Ford Mustang Mach-E vehicles equipped with Co-Pilot360 Active 2.0 and/or BlueCruise manufactured for sale or lease in the United States, including, but not limited to, current U.S. territories and possessions.
- **Peer Vehicles:** All other Ford and Lincoln vehicles equipped with any version of the BlueCruise partial driving automation system manufactured for sale or lease in the United States, including, but not limited to, current U.S. territories and possessions.

- <u>Subject System:</u> All hardware, software, data, and any other related systems that contribute to the performance of the BlueCruise partial driving automation system.
- <u>Subject Crashes:</u> Incidents in which any subject or peer vehicle experiences a crash, regardless of fault/cause, in the United States (including any of its territories) with the subject system actually or allegedly engaged at any time during the period beginning 30 seconds immediately prior to the commencement of the crash through the conclusion of the crash.
- **Alleged Defect:** Failure of the subject system to avoid or mitigate a crash with a vehicle or object in front of the subject vehicle.
- **Ford:** Ford Motor Company, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its 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 Ford (including all business units and persons previously referred to), who are or were involved in any way as of January 1, 2016, with any of the following related to the subject system 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 Ford, 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 Ford 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 in the subject system, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Ford has previously provided a document to ODI, Ford 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 Ford'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 Ford has manufactured for sale or lease in the United States. Separately, for each subject or peer vehicle manufactured to date by Ford, state the following:
 - a. Vehicle identification number (17-character VIN);
 - b. Make;
 - c. Model;

- d. Model year;
- e. Trim level;
- f. Date of manufacture (MM/DD/YYYY);
- g. Date warranty coverage commenced (MM/DD/YYYY);
- h. The State in the United States where the vehicle was originally sold or leased, or delivered for sale or lease (postal abbreviation);
- i. Subject system design version (trade / trim name);
- j. Subject system hardware version installed as original equipment;
- k. Subject system software version installed as original equipment;
- l. Whether the vehicle has an active subscription to BlueCruise (Yes/No);
- m. If the answer is either "Yes" or "No" for subpart l, the start date of the vehicle's most recent active subscription to BlueCruise (MM/DD/YYYY);
- n. If the answer is "No" for subpart l, state the end date of the vehicle's most recent active subscription to BlueCruise (MM/DD/YYYY); and
- o. Dates and identities of the most recent software, and/or hardware updates related to BlueCruise.
- 2. For each design version of the subject system, provide the aggregate cumulative mileage driven in subject and peer vehicles with the subject system engaged. Provide this information separately by make, model, and model year. If this information is only available for a portion of the subject and peer vehicles equipped with a certain version of the subject system, please indicate the total population of vehicles and the make, model, model year, and trim level of the vehicles from which the aggregate mileage information is being sourced.
- 3. State the number of each of the following for the subject and peer vehicles received by Ford, or of which Ford is otherwise aware, which would qualify as a subject crash as defined above, including incidents that were previously submitted to NHTSA and those that are otherwise responsive to the PE24012 information request letter dated June 4, 2024:
 - a. Consumer 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 Ford is or was a party to the arbitration;
 - f. Lawsuits, both pending and closed, in which Ford is or was a defendant or codefendant; and
 - g. Legal claims asserted and settled before formal proceedings began, in which Ford 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 problem and causal and contributing factors and Ford's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" through "g" 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.

- 4. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 3, state the following information:
 - a. Ford's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 3 (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. Details of the alleged of the crash including:
 - i. Incident time;
 - ii. Incident site location (latitude and longitude);
 - iii. List of involved vehicles, objects, and persons;
 - iv. Speed and direction of the subject vehicle;
 - v. Location / orientation of the subject vehicle in relation to other involved vehicles, objects, persons at the time of impact;
 - vi. Pre-impact behavior of other involved vehicles, objects and persons;
 - vii. Timing of subject system engagement / disengagement over the 30 second period leading to the crash;
 - viii. Description of any intervention taken by the subject system;
 - ix. Description of any intervention taken by collision warning and avoidance systems (e.g., AEB, FCW);
 - x. Description of any intervention taken by the driver of the subject vehicle;
 - k. Whether property damage is alleged;
 - l. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any.
- 5. Produce copies of all documents, including those within Ford's GRID system, related to each item within the scope of Request No. 3. Organize the documents separately by

subject crash. Describe in detail the search methods and search criteria used by Ford to identify the items in response to Request No. 3. In addition, provide a full copy of any report, including expert reports, that has been produced by Ford or received from another party in any investigation, lawsuit, arbitration, or a pre-suit claim regarding the incidents identified in Request No. 3.

- 6. Furnish a list of all design versions of the subject system (including applicable trade names / trim levels) available in the subject and peer vehicles by make, model, model year, and trim level. Identify any versions of the subject system that have become available in subject and peer vehicles <u>after</u> Ford's response to the PE24012 information request letter dated June 4, 2024. For each newly available version of the subject system, supplement Ford's response to Request No. 5 of the PE24012 information request letter, identifying all substantive differences from prior versions of the subject system.
- 7. Separately, for each newly available version of the subject system, supplement Ford's response to Request No. 9 of the PE24012 information request letter, identifying all substantive differences from prior versions of the subject system.
- 8. Separately, for each newly available version of the subject system, supplement Ford's response to Request No. 10 of the PE24012 information request letter, identifying all substantive differences from prior versions of the subject system.
- 9. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the subject system in the subject vehicles that Ford has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities, including documents which were previously responsive to the PE24012 information request letter dated June 4, 2024. This request 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 Ford is planning to issue within the next 120 days.
- 10. Describe all modifications or changes made by, or on behalf of, Ford in the design, material composition, manufacture, quality control, supply, or installation, from the start of production to date, which relate to, or may relate to, the performance of the subject system in the subject vehicles, including modifications or changes which were previously responsive to the PE24012 information request letter dated June 4, 2024. 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 Ford is aware of which may be incorporated into vehicle production within the next 120 days.

- 11. Provide a description of the expected performance of a subject vehicle operating with the subject system engaged when approaching a hazard located in the subject vehicle's travel lane. Separately, furnish a detailed technical assessment of the effect of each of the following factors on the performance of the subject system in this scenario:
 - a. The type of hazard (i.e., vehicle, barrier, other object);
 - b. Whether the hazard is moving or stationary;
 - c. The closing speed between the subject vehicle and the hazard;
 - d. The amount of ambient lighting present in the area of the hazard;
 - e. If the hazard is a vehicle, the presence of illuminated taillights on the vehicle;
 - f. If the hazard is a vehicle, the presence of illuminated flashing hazard lights on the vehicle;
 - g. The lateral position of the hazard relative to the subject vehicle;
 - h. The heading angle of the hazard relative to the subject vehicle;
 - i. The profile and grade of the roadway; and
 - j. Any other environmental factors deemed pertinent.
- 12. Separately provide all analysis, research, data, and testing related to your response to Request No. 11. Provide copies of all documents related to this request, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically and by subsection.
- 13. Describe in detail the software logic and/or algorithms utilized in the detection and classification of hazards in front of the subject vehicle when the subject system is engaged. Provide this information separately for each design version of the subject system used in the subject vehicles.
- 14. Produce all internal documents and communications concerning, and provide a detailed explanation of, all design considerations which alter or restrict the subject system's control authority over braking based on the speed of the subject vehicle and/or the type of hazard detected by the subject system. This response should cover, but not be limited to, the following:
 - a. Technical details regarding any system limitations which the design consideration(s) aim to address;
 - b. The engineering justification for the design consideration(s);
 - c. The engineering justification for all parameters chosen when implementing the design consideration(s), such as any applicable speed thresholds;
 - d. Any other approaches or parameters considered when implementing the design consideration(s); and

- e. Any changes which have been made relating to the design consideration(s) since the original implementation. If applicable, provide a cross-reference to the specific changes described in response to Request No. 10.
- 15. Describe all engineering controls that limit or alter the operation of the subject system (including both extended/hands-free and limited/hands-on modes) during scenarios when failure conditions are more likely to occur, or system limitations are more likely to be met.
- 16. Separately, for each engineering control describe above, state whether and how they are utilized in the following scenarios/conditions:
 - a. A trouble code or fault code is issued by the subject system;
 - b. A trouble code or fault code is issued by another vehicle system;
 - c. The vehicle set speed exceeds the safe speed for the section of roadway;
 - d. The vehicle enters a section of roadway not designated as a "Blue Zone";
 - e. The vehicle enters a section of roadway marked as an active construction zone;
 - f. The vehicle enters a section of roadway with narrow-radius curves;
 - g. The vehicle enters a section of roadway with narrow or wide travel lanes;
 - h. The vehicle enters a section of roadway where lanes are diverging or there is a lane drop, such as passing by a highway exit;
 - i. The vehicle enters a section of roadway with poor, obstructed, or no lane markings;
 - j. The vehicle detects a hazard that it is unable to avoid;
 - k. There is inclement weather (i.e. rain, other precipitation, or fog);
 - l. The vehicle is driving into direct sunlight; and
 - m. There are low ambient lighting conditions.
- 17. Provide a list of all manners, including all written materials, in which subject system capabilities and limitations are communicated to the consumer, both prior to and during vehicle ownership, and both prior to and during operation of the subject system. Separately, provide all documents related to each listed manner of communication with appropriate subsections and/or page numbers identified.
- 18. Furnish Ford's assessment of the degree to which consumers' expectations and understanding of subject system capabilities and limitations meet actual subject system capabilities and limitations. Separately, provide all documents pertaining to analysis, research, data, and testing used by Ford to evaluate consumers' understanding of subject system capabilities and limitations, both prior to and during vehicle ownership.
- 19. Identify all acceptable positions where drivers can place their hands and all acceptable activities that drivers may participate in while operating the subject system in extended/hands-free mode.
- 20. Furnish Ford's assessment of the effect of the placement of a driver's hands and the participation in listed activities on their ability to intervene when required and take action to avoid a hazard. Separately, provide all analysis (whether in interim, draft, or final

- form), research, data, and testing used to evaluate driver reaction times when intervention is required while operating the subject system in both limited/hands-on mode and extended/hands-free mode. For all provided human factors studies, identify the human subject recruitment criteria.
- 21. Furnish Ford's assessment of the subject system's impact on the human perception action loop and how driver engagement is supported, encouraged, and assessed via system design, including but not limited to the driver monitoring system (including both assessment and alerting metrics).
- 22. Furnish Ford's assessment of the subject system's ability to support and maintain driver engagement within the human perception-action loop, independent of the driver monitoring system. Specifically, describe how system design considerations and features provide implicit and explicit feedback that support and encourage driver engagement when the driver monitoring system is not actively alerting the driver.
- 23. Furnish a list of all forms of potential misuse or abuse of the subject system that were considered in the development of the subject system. Separately, for all listed forms of potential misuse or abuse, provide all mitigation strategies implemented to encourage appropriate driver behavior.
- 24. Provide a detailed timeline and description of all investigative activities conducted by, or on behalf of Ford, pertaining to the subject fatal crashes identified by the following Standing General Order 2021-01 report identification numbers: 502-7268, 502-7426. If the investigations into these subject crashes are ongoing, identify the additional investigative activities that are required to complete the investigation, in addition to the activities completed to date. Separately, identify all third parties involved in any aspect of the investigation of these subject crashes, and describe their role/function.
- 25. Furnish Ford's assessment of the alleged defect in the subject crashes, including:
 - a. The causal or contributory factor(s);
 - b. Whether or not all of the hardware in the subject system was designed properly and performed as intended; and
 - c. Whether or not all of the software in the subject was designed properly and performed as intended.

In addition to responses to each subsection of the above request, provide copies of all documents that Ford used to form all portions of its assessment, regardless of whether the documents are in interim, draft, or final form. If related documents were provided in response to a previous request, such as Request No. 5, please indicate as such.

Legal Authority for This Request

This letter is being sent to Ford 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

Ford's failure to respond promptly and fully to this letter could subject Ford 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 \$27,874 per violation per day, with a maximum of \$139,356,994 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 Ford cannot respond to any specific request or subpart(s) thereof, please state the 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. reason why it is unable to do so. If on the basis of attorney client, attorney work product, or other privilege, Ford does not submit one or more requested documents or items of information in response to this information request, Ford 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 Ford's response contains any information that you claim is confidential business information, Ford 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, Ford must submit <u>a copy</u> 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, Ford must check the "Contains CBI" box. In addition, Ford, 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 EA25001-01 in Ford's response to this letter and in the request for confidential treatment that Ford may submit.

Due Date

Ford's response to this letter must be submitted to this office by August 6, 2025. If Ford finds that it is unable to provide all of the information requested within the time allotted, Ford must request an extension from me at (202) 366-9590 no later than five business days before the response due date. If Ford 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 Ford then has available, even if an extension has been granted.

If you have any technical questions concerning this matter, please call Joseph Teitelman of my staff at (202) 438-5722.

Sincerely,

Tanya Topka

Tanya Topka, Director 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:

SGO 2021-01 report ID: 502-7268

SGO 2021-01 report ID: 502-7426

SGO 2021-01 report ID: 502-6852

SGO 2021-01 report ID: 502-8738

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. 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 or (202)366-8534.