

NVS-215  
R. Willard

JUL 31 2007

Eliot Pedrosa  
Greenberg Traurig, P.A.  
1221 Brickell Avenue  
Miami, FL 33131

Re: Confidentiality Determination (Omni United)/EQ07-002 (Hangzhou-manufactured tires)

Dear Mr. Pedrosa:

This responds to your July 12, 2007 request seeking confidential treatment for information submitted by Omni United (USA) Inc. (Omni) that responds to an agency request in the above matter. Specifically, Omni requests confidential treatment for information contained in Exhibits 1.1 (monthly tire sales summary), 3.1 (customer tire sales summary), and 4.1 (customer list) regarding tires imported from Hangzhou Zhongce Rubber Company, Ltd. You seek confidential treatment for a period of three (3) years.

Your letter and accompanying certificate indicate that the information provided is confidential and proprietary data that has never been released or become available outside of Omni. You state that the disclosure of this information would be used by its competitors to eviscerate its current and long-term competitive position by using Omni's customer base. You add that the information is of the type that courts have consistently recognized as confidential under Exemption 4 of the Freedom of Information Act (FOIA).

I have decided to grant your request.

Subject to the conditions below, this grant of confidential treatment will remain in effect indefinitely.

This grant of confidential treatment is subject to certain conditions. The information may be disclosed under 49 CFR § 512.22 based upon newly discovered or changed facts, and you must inform the agency of any changed circumstances that may affect the protection of the information (49 CFR § 512.10). If necessary, you will be notified prior to the release of any information under the procedures established by our regulations (49 CFR § 512.22(b)).

Sincerely,



Otto G. Matheke, III  
Senior Attorney

NIITSA:NCC-113:Kido/Matheke:61834:07/31/07

NCC-113:Subj/Chron, mk, om, cyt **NCC07-003534**

NVS-215: R. Willard - w/enclosures

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