

The Goodyear Tire & Rubber Company
Akron, Ohio 44316 - 0001

July 9, 2007

Office of Chief Counsel (NCC-111)
National Highway Traffic Safety Administration (Room W-41)
1200 New Jersey Avenue SE
Washington, DC 20590

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COUNSEL
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Re: Request for Confidential Treatment of Information Included in Goodyear's Response to a Request for Information Related to EQ07-002

Pursuant to 49 C.F.R. Part 512, The Goodyear Tire & Rubber Company (hereinafter, "Goodyear") seeks confidential treatment of the information submitted in response to a request for information related to EQ07-002. Attached is the "Certificate in Support of Request for Confidentiality," required under Appendix A to 49 C.F.R. Part 512, as well as a Verification Affidavit. Other specific information required by 49 C.F.R. Part 512 is provided below.

Information Supporting Goodyear's Request for Confidentiality

The data contained on those pages marked "CONFIDENTIAL" is considered business information the disclosure of which would be detrimental to the business interests of Goodyear. Specifically, the information contained in the responses to questions 1) and 3) include sales figures for the subject peer tires that are not readily available to our competitors. Information contained in the response to questions 2) and 4) contain tire construction information for these tires that is also not readily available to our competitors. The release of this data to the news media and /or the public would likely cause substantial competitive harm to Goodyear. See *National Parks and Conservation Association v. Morton*, 498F.2d 765 (D.C. Cir. 1974).

For these reasons, there is attached an affidavit in support of Goodyear's request for confidentiality with respect to the information supplied in response to this request.

Thank you in advance for your consideration of this request for confidential treatment of the response. Additionally, the Affidavit that verifies the responses is also attached. Please direct all correspondence concerning Goodyear's request for confidentiality directly to me.

Sincerely,



Simeon S. Ford
Manager, Global Regulations, Standards & Compliance
The Goodyear Tire & Rubber Company

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, **Simeon S. Ford**, pursuant to the provisions of 49 CFR Part 512, state as follows:

- (1) That I am the Manager, Government and Customer Compliance for The Goodyear Tire & Rubber Company ("Goodyear"), and that I am authorized by Goodyear to execute this certificate on its behalf;
- (2) I certify that the information contained in the response to the request for information related to EQ07002 is confidential and proprietary data, would likely cause substantial competitive harm to Goodyear if released to the public and is therefore being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(3) and (4);
- (3) I hereby request that the information submitted in the response to the request for information related to EQ07002 be protected for an indefinite period of time;
- (4) This certification is based on the information provided by the responsible Goodyear 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 Goodyear;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which Goodyear has claimed confidential treatment has never been released or become available outside Goodyear or its affiliates in such detailed form.
- (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 Goodyear because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and
- (7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this the 9th day of July, 2007.



Simeon S. Ford,
Manager, Global Regulations, Standards & Compliance

VERIFICATION AFFIDAVIT

STATE OF OHIO)
) ss.:
COUNTY OF SUMMIT)

I, SIMEON S. FORD, being duly sworn, depose and say:

(1) That I am the Manager, Global Regulations, Standards & Compliance for The Goodyear Tire & Rubber Company ("Goodyear"), and that I am authorized by Goodyear to execute this affidavit on its behalf.

(2) That the information contained in the response to the request for information related to EQ07002 by Goodyear to the Office of Defects Investigation pertaining to production data has been provided where it is available from within Goodyear.

(3) I verify that the matters stated therein are not within my personal knowledge; that the facts stated therein have been assembled by authorized employees and counsel of Goodyear and I am informed that the facts therein are true.

Simeon S Ford

Simeon S. Ford, Manager
Manager, Global Regulations, Standards & Compliance
The Goodyear Tire & Rubber Company

Sworn to before me, a Notary Public, this 9th day of July, 2007.

Elaine M. Horst
Notary Public

ELAINE M. HORST
RESIDENT SUMMIT COUNTY
2007
7/9/07