

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

July 27, 2007

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

**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 8) and 9) includes tire testing information and testing frequency information that is 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

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George Person, Chief
Recall Management Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Subject: Follow-up Response to Request for Information on Hangzhou Manufactured Tires

Reference: EQ07-002

Dear George,

Our responses to questions #8 and #9 follow:

8. Describe all testing that your company conducted, arranged to have conducted (e.g., by a test laboratory) and/or that your company otherwise relied on in certifying that each of the subject tires were in compliance with the Federal Motor Vehicle Safety Standards. For each test, state the date of the test, describe the tire tested including model, size, and production date, describe the test (e.g., FMVSS No. 119 with "S" paragraph number) and state the test results. This information request covers a period prior to 2001 if the certification testing occurred before 2001.

RESPONSE: * See the tables on attachment "A."

9. Describe all testing that your company conducted, arranged to have conducted (e.g., by a test laboratory) and/or that your company otherwise had information on the subject tires, other than certification tests identified in your answer to Number 8 above. For each test, state the date of the test, describe the tire tested including model, size, and production date, describe the test and state the test results. This information request covers a period prior to 2001 if for subject tires designed and tested before 2001.

RESPONSE: * See the tables on attachment "B."

Sincerely,



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

* Attachments submitted to Office of Chief Counsel with request for confidentiality.

ATTACHMENT "A"

Response to Question 8.

[CONFIDENTIAL]

ATTACHMENT "B"

Response to Question 9.

[CONFIDENTIAL]