

NHTSA  
WASHINGTON, DC 20590

September 14, 2007

2007 SEP 18 A 8:34

Anthony Cooke, Esq.  
Office of Chief Counsel  
National Highway Traffic Safety Administration  
West Building, Room W41-227  
1200 New Jersey Avenue S.E.  
Washington, D.C. 20590

OFFICE OF CHIEF COUNSEL GM686A and GM688A Supplement 2  
COUNSEL

NVS-213cla and NVS-213dlr  
EA06-009 and EA06-016

Dear Mr. Cooke:

Enclosed with this letter are three copies of General Motors' (GM) presentation materials, dated September 6, 2007 regarding investigations of Saturn Timing Chain and C/K Crank Position Sensor issues. GM is submitting this information voluntarily to the Director of ODI.

General Motors requests the documents stamped "GM Confidential" be afforded confidential treatment without a time limitation by the NHTSA. These are included in the electronic disc identified as ATT\_2\_GM\_CONF in the folders labeled Q\_08. This information is voluntary submission to the agency and is not customarily made public by General Motors and contains trade secrets and commercial information which is privileged or confidential under 5 U.S.C. Section 552(b)(4), 49 CFR Part 512 and 49 U.S.C. Section 30167(a).

The following identifies the specific type of confidential information contained in the document:

Document Name	Information types
Stall Investigation presentation 06SEP07	GM's application of engineering judgment and analysis methodologies.

GM requests confidential treatment of the information in this document because it includes trade secrets and the disclosure of which would cause substantial competitive harm. GM submits that the competitive harm would be substantial because the design and manufacture of vehicles and vehicle components are the core of its business and because global competition in that business is intense.

The document labeled "Stall Investigation presentation 06SEP07" on the Attachment 2 Disc GM CONFIDENTIAL identified above discloses information about GM's application engineering business process for engineering judgment, analysis methodologies, and action. This information would give competitors insight into GM's methodologies and disclose confidential information about the design and performance of its products, without spending their own resources compensating GM for the knowledge they would gain.

GM treats the above material as confidential proprietary information available only to authorized GM, supplier, and customer personnel who have a business need for them, and are not otherwise available to the public. These documents are maintained under a record-keeping system that is intended to control dissemination of this material within GM and supplier and customer personnel, and to assure that it is not freely disseminated outside the Corporation. Multiple security systems are used to limit access to facilities and record storage systems where confidential information is stored and employees receive training in information security policies and procedures.

**Product Investigations**

Mail Code: 480-210-G11 • 30001 Van Dyke Road • Warren, MI 48090  
GM686A nad GM688A Supplement 2 Confidentiality Request.doc



Letter to Anthony Cooke  
EA06-009 / GM686A and  
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To the best of our knowledge, the NHTSA, other Federal Agencies, or the Federal Courts has made no prior determinations of the confidentiality for these documents. These types of documents, however, have normally been granted confidential treatment by the NHTSA in the past, to the best of our knowledge.

The documents subject to this request for confidentiality are being provided and have been clearly stamped "GM CONFIDENTIAL" on a Disc label. If a request for disclosure of any or all of this information is received by the NHTSA, General Motors requests notification of receipt of each such request and, if necessary, an opportunity to further explain the reasons why such material is trade secret and commercial information which should not be disclosed under the applicable statutes and regulations.

If you require further information about this request, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Kent", with a long horizontal flourish extending to the right.

Gay P. Kent  
Director

Product Investigations

Enclosure

**CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY**

I, Gay P. Kent, pursuant to the provisions of 49 CFR Part 512, state as follows:

- (1) I am Director of Product Investigations of General Motors Corporation and am authorized to execute this certificate on its behalf.
- (2) I certify that the information contained in the documents identified in the letter dated September 14, 2007 is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4) and 49 C.F.R. Part 512.
- (3) I hereby request that the information be protected without a time limitation.
- (4) This certification is based on the information provided by the responsible GM personnel who have responsibility for the documents being provided to NHTSA for which a claim of confidentiality has been made.
- (5) Based on that information, to the best of my knowledge, information and belief, the information for which GM has claimed confidential treatment has never been released or made available outside GM and supplier or customer personnel.
- (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 GM because of unauthorized or inadvertent disclosure.
- (7) I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 14<sup>th</sup> day of September 2007.



Gay P. Kent  
Director  
Product Investigations