

June 4, 2009

VIA EMAIL: alexander.ansley@dot.gov

AND BY FEDERAL EXPRESS

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

Re: Irvine Shade & Door, Inc./EQ08-015

Dear Mr. Person:

Enclosed is our client, Irvine Shade & Door, Inc.'s ("Irvine") response to your letters dated March 5, 2009 and December 30, 2008 which requested information relating to allegedly defective shower doors manufactured by Irvine for the recreational vehicle industry. Per our telephone conference last week, it is my understanding that your office agreed to limit at this time its requests of Irvine to a list of Irvine's end stage customers that may potentially have purchased the shower door at issue. That list is enclosed with this letter.

Irvine believes that the confidentiality standard set forth in 49 CFR 512.15(b) is applicable to this request. Under this standard, information should be accorded confidential treatment if its disclosure "would be likely to cause substantial harm to the competitive position of the submitter."

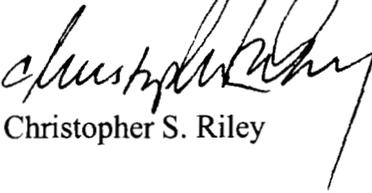
All information for which Irvine is requesting confidential treatment meets this standard. Disclosure of the identity of Irvine's customers would provide a significant competitive advantage to its competitors, since they could tailor their marketing efforts to Irvine's detriment. This sort of information has traditionally been kept confidential by manufacturers of motor vehicle equipment and by the agency.

Irvine requests that all of this information be accorded confidential treatment for an indefinite period. The customer data will retain their competitive sensitivity and will have competitive value for an indefinite period in the future. As required by Part 512, I have sent Irvine's claim for confidential treatment to the Chief Counsel of NHTSA.

If you have any additional questions or requests of Irvine, please do not hesitate to contact me.

Sincerely,

BARNES & THORNBURG LLP

A handwritten signature in black ink, appearing to read "Christopher S. Riley". The signature is written in a cursive, flowing style with a long, sweeping tail that extends downwards and to the right.

Christopher S. Riley

CSR/hat
Enclosure

cc: Nick Donis (w/o encl.)
Samuel S. Thompson (w/o encl.)