



**James P. Vondale, Director**  
Automotive Safety Office  
Environmental & Safety Engineering

**Fairlane Plaza South**  
330 Town Center Drive  
Dearborn, MI 48126-2738 USA

November 6, 2009

Mr. Oakley Kevin Vincent  
Chief Counsel  
Office of the Chief Counsel  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE/W41-322  
Washington, D.C. 20590

OFFICE OF CHIEF  
COUNSEL  
2009 NOV 10 A 11: 59  
NHTSA  
WASHINGTON, DC 20590

Dear Mr. Vincent:

**Subject: Request Under 49 CFR Part 512 for Confidential Treatment of Information**

Two copies of confidential information referenced in the Ford Motor Company (Ford) November 6, 2009, email response to the agency's October 23, 2009, email request for additional information related to the PE09-031 inquiry, are attached. Also, Attachment 1, for your reference, is a copy of the non-confidential portion of Ford's response to the ODI's information request.

This letter provides support for Ford's claim of confidentiality in accordance with 49 CFR Part 512.8. Ford requests confidential treatment for the documents provided on the attached compact disc because the documents are not customarily released to the public by Ford and because the documents contain confidential business information, the disclosure of which would likely cause substantial competitive harm to Ford (as contemplated in 49 CFR § 512.15, 5 and U.S.C. § 552(b)(4)). The documents being provided are release level engineering drawings. The drawings contain Ford proprietary intellectual property and could be used by competitors to develop or improve their own products and processes without the need to invest the substantial resources invested by Ford.

Ford documents of the types listed are maintained under a record keeping system which is intended to control dissemination of this material within Ford, and to assure that the material is not disseminated outside of Ford, except as described in the attached (Attachment 2) certification, which is made pursuant to 49 CFR Part 512.4(b).

Compact discs containing copies of documents provided are labeled "CONFIDENTIAL" and documents contained in the electronic files are marked "ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION" in the top margin, as part of this response. Ford notes that these PDF documents were created using Adobe Acrobat 8.0 Professional and must be



printed by selecting "document and comments" or "document and markups" in order to print the appropriate bracket markings.

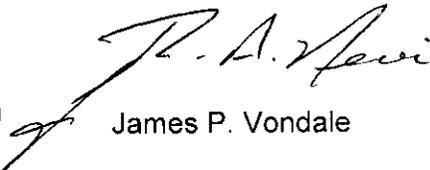
These documents contains commercial information and are exempt from disclosure pursuant to 49 CFR § 512.15, and 5 U.S.C. § 552(b)(4).

Ford requests that these documents be granted confidential treatment by the agency for a period of ten years. Earlier disclosure of these documents, in Ford's opinion, would result in substantial competitive harm.

In the event that the agency should conclude that all or part of the submitted information is not to be given confidential treatment, Ford asks the agency to provide reasonable notice of not less than ten working days prior to any contemplated disclosure in order that Ford may pursue such legal remedies as it may choose. Please direct all written notices to me at Ford Motor Company, Suite 400, Fairlane Plaza South, 330 Town Center Drive, Dearborn, Michigan 48126. Please direct all non-written communication to Ms. Kara Tertzag-Lividini who may be contacted by telephone at (313) 323-8559.

Thank you for your continuing courtesy.

Sincerely,



James P. Vondale

Attachments