VOLKSWAGEN

NHTSA
WASHINGTON, DC 20590

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OFFICE OF CHIEF COUNSEL

October 15, 2003

3800 Hamlin Road
Auburn Hills, MI 48326
Tel. (248) 754-5000

Jacqueline Glassman, Chief Counsel
National Highway Traffic Safety Administration
Room 5219
400 Seventh St., S.W.
Washington, D.C. 20590

Subject: Submission of NHTSA EA03-13: Eurovan, Winnebago Rialta cooling fan response – Letter addressed to Mr. Tom Cooper, dated October 15, 2003.

Dear Ms. Glassman,

This is to transmit, pursuant to 49 CFR Part 512 (2003), two copies of documents responsive to NHTSA's request, EA03-013, for which we are requesting confidentiality.

These documents are being submitted under 49 CFR Part 512.15(a),(b) (2003). Volkswagen considers this information to be a trade secret, as it details material specifications and performance criteria. Disclosure of the information would result in substantial competitive harm to Volkswagen, because competitors may use this information to produce similar parts.

Please contact Kevin McDonald at (248) 754-5420, if you would like to discuss any aspects of this submission.

Sincerely,

VOLKSWAGEN OF AMERICA, INC.

John Maddox
Compliance Officer

Certificate in Support for Request for Confidentiality
Pursuant to the provisions of 49 CFR 512 (2003)

(1) I am the **Compliance Officer** and I am authorized by **Volkswagen of America, Inc. ("VWoA")** to execute this certificate on its behalf;

(2) I certify that the information contained in **Laboratory report Number 203100** 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) (as incorporated by reference in and modified by the statute under which the information is being submitted);

(3) I hereby request that the information contained in **Laboratory report Number 203100** be protected for **10 years**;

(4) This certification is based on the information provided by the responsible **VWoA** 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 **VWoA**;

(5) Based upon that information, to the best of my knowledge, information and belief, the information for which **VWoA** has claimed confidential treatment has never been released or become available outside **VWoA**; (except as hereinafter specified);

(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 **VWoA** 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 **15th day of October 2003**. (If executed outside of the United States of America: I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct).

Compliance Officer