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November 1, 2005

VIA FEDERAL EXPRESS

Mr. Stephen Wood, Esq.
Acting Chief Counsel
National Highway Traffic Safety Administration
Room 5219
400 Seventh Street, SW
Washington, DC 20590

RECEIVED
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10:30 AM

**Re: EA 05-005, Response of Texas Instruments, Inc. to August 31, 2005
Information Request from Office of Defects Investigation**

**Request Pursuant to 49 C.F.R. Part 512 for Confidential Treatment of
Documents**

Dear Mr. Wood:

On August 31, 2005, the Office of Defects Investigation ("ODI") issued an Information Request to Texas Instruments, Inc. ("TI") in connection with EA 05-005. TI, a supplier to Ford of certain speed control deactivation switches involved in the NHTSA investigation, responded (pursuant to an agreed extension) on October 3, 2005 to ODI with a lengthy (22 page) letter, plus exhibits (attached). TI is today supplying to ODI the documents that are responsive to NHTSA's requests. During its pre-production review of these documents, TI determined that a small number of documents should be treated as confidential pursuant to 49 C.F.R. § 512.4-6, 5 U.S.C. § 552(b)(4), and 49 U.S.C. § 30167 and accordingly should not be produced in the public record of EA 05-005. This letter provides TI's support for the request for confidentiality pursuant to 49 C.F.R. Part 512. As noted further below, Ford also requests confidential treatment for certain other documents that TI is providing to NHTSA.

The documents for which TI and Ford seek confidentiality protection are responsive to request number 10 of ODI's August 31, 2005 Information Request. Two sets of the documents for which TI seeks confidential treatment ("Confidential Documents") are being produced with this letter. TI requests that these documents be granted confidential treatment by NHTSA permanently, or at least for a period of ten years, in order to avoid the competitive harm described below.

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TI requests confidential treatment for the Confidential Documents because these documents reflect certain information pertaining to the proprietary business relationships and dealings between TI and Ford which competing suppliers could use to identify strategic thinking and views of both companies without the need to invest the substantial resources invested by both TI and Ford. The disclosure of these documents thus could result in substantial competitive harm to both Ford and TI by revealing business strategies of both companies with respect to their dealings on sensitive supplier relationship issues and their resolution of commercially sensitive matters. See 49 CFR § 512.5(c)(2). The particular pressure switches addressed in these Confidential Documents are still in production for replacement parts.

The Confidential Documents have not been released publicly during litigation or otherwise released outside of TI or Ford, and are not the type of documents customarily released to the public by TI. To the best of TI's knowledge, no federal court or federal agency, including NHTSA, has made any determinations relating to the confidentiality of this material. Most of the Confidential Documents were labeled with a Confidential designation at the time of their preparation.

A certificate attesting to the confidentiality of the documents at issue accompanies this letter, as required by 49 CFR § 512.4(b). This certificate has been executed by Mr. Steven Reynolds, Senior Counsel, Texas Instruments.

In addition, TI has advised Ford of certain documents included in the TI production and Ford has indicated that it has a similar confidentiality interest in certain of those documents. A letter and certification prepared by Ford requesting that NHTSA afford confidential treatment for those documents in which Ford has a confidentiality interest is attached to this letter. TI does not object to Ford's request for confidentiality of these documents.

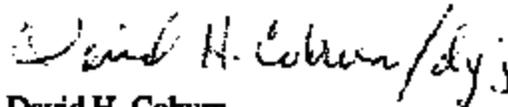
Confidential treatment is sought for the full text of each of the Confidential Documents. TI has stamped each page of each Document with a "CONFIDENTIAL" legend at the top of the page. The Confidential Documents as to which TI is requesting confidential treatment are bates labeled as TI NHT05 11750-11777. The Confidential Documents for which Ford is requesting confidential treatment are labeled NHT05 11741-11749.

TI requests that your office provide reasonable notice of not less than 10 days to TI if a determination is made that the documents, or some portion thereof, will not be granted confidential treatment. Please contact the undersigned at (202) 429-8063 with any questions or any notices regarding TI's request for confidentiality.

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Thank you in advance for your assistance in this matter.

Respectfully,

A handwritten signature in cursive script that reads "David H. Coburn / dyc".

David H. Coburn
Attorney for Texas Instruments, Inc.

Enclosures:

Letter from James P. Vondale, Director, Automotive Safety Office,
Ford Motor Company
Certificates executed by TI and Ford in Support of Request for Confidentiality
Confidential Documents TI NHT05 11741- 11777 (2 sets)

Certificate in Support of Request for Confidentiality

I, Steven P. Reynolds, pursuant to the provisions of 49 CFR part 512, state as follows:

(1) I am Steven P. Reynolds, Senior Counsel, for Texas Instruments, Inc. ("TI") and I am authorized by TI to execute this certificate on its behalf.

(2) I certify that the information contained in the documents accompanying this Certificate ("Confidential Documents") contain confidential and proprietary data 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) and NHTSA's confidentiality rules at 49 CFR Part 512. Specifically, the Confidential Documents reflect sensitive and proprietary business dealings and relationships between TI and one of its customers, the Ford Motor Company, with respect to the supply of motor vehicle parts. Public disclosure of this information would cause competitive harm to TI by educating competitors of TI about the manner in which TI has managed its relationship with Ford and about strategic decisionmaking concerning the TI/Ford relationship. Such information could be used by competitors to TI's disadvantage relative to relationships between those competitors and vehicle manufacturers, including Ford, with which TI also does business. At the time of their preparation, TI deemed these documents to be sensitive commercial documents and all or most of the documents are so labeled.

(3) I hereby request that the information contained in the Confidential Documents be protected for an indefinite period of time. TI still manufactures for automotive use the sensor switch to which these Documents relate.

(4) This certification is based on the information provided by the responsible TI personnel who have authority in the normal course of business to release the Documents for which a claim of confidentiality has been made to ascertain whether such Documents have ever been released outside TI.

(5) Based upon that information, to the best of my knowledge, information and belief, the Documents for which TI has claimed confidential treatment have never been released or become available outside TI.

(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 TI.

(7) I certify under penalty of perjury that the foregoing is true and correct. Executed on this 17th day of October, 2005.


Steven P. Reynolds



James P. Vondra, Director
Automotive Safety Office
Environmental & Safety Engineering

Warren Plaza South
330 Town Center Drive
Dearborn, MI 48126-3738 USA

October 14, 2005

Mr. Stephen Wood, Esq.
Acting Chief Counsel
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20000

Dear Mr. Wood:

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

Two copies of Ford Motor Company (Ford) confidential information referenced in the Texas Instruments (TI) response to the agency's August 31, 2005 inquiry, EA05-005, are attached.

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 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, and 5 U.S.C. § 552(b)(4)). In response to direction provided by your office concerning prior confidentiality submissions, the confidential documents in this submission are described in Attachment I.

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 certification, which is made pursuant to 49 CFR Part 512.4(b). Neither NHTSA nor other Federal agencies nor Federal courts have made determinations relating to the confidentiality of the submitted information or similar information, to the best of our knowledge.

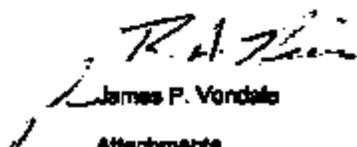
The documents provided are labeled "ENTIRE PAGE CONFIDENTIAL".

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 notices to Paul Fabien, Ford Motor Company, Suite 1400, Parklane Towers West, Three Parklane Blvd., Dearborn, Michigan 48126. Mr. Fabien may also be contacted by telephone at (313) 621-1858 or by e-mail at pfabien2@ford.com. Thank you for your continuing courtesy.

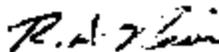
Sincerely,


James P. Vondala
Attachments

**CERTIFICATE IN SUPPORT OF REQUEST
FOR CONFIDENTIALITY**

I, R. A. Navi, pursuant to the provisions of 49 CFR Part 512, state as follows:

1. I am Assistant Director, Global Automotive Safety Compliance, Automotive Safety Office, and I am authorized by Ford Motor Company (Ford) to execute documents of this nature on behalf of Ford;
2. The information contained in the attachment to Ford's October 14, 2005 letter to NHTSA's Office of the Chief Counsel contains confidential and proprietary data and is submitted with the claim that it is entitled to confidential treatment under 5 U.S.C., § 552(b)(4);
3. A member of my staff has inquired of the responsible Ford personnel who have authority in the normal course of business to release the type of information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Ford;
4. Based upon such inquiries, to the best of my knowledge, information and belief, the information for which Ford has claimed confidential treatment has never been released or become available outside Ford except as hereinafter specified:
 - Portions of these documents may have been or may be shared with Ford suppliers with the expectation that they will be kept confidential.
 - During the course of defending itself in litigation, Ford may have been, or may be required to produce such information.
5. 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 Ford because of unauthorized or inadvertent disclosure, except as stated in Paragraph 4; and
6. I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 14th day of October 2006.



R. A. Navi

Trust Instruments Response to EASM-005
Request for Consideration of Confidential Treatment of Documents

October 14, 2005

Attachment I

Appendix	Document Type	Document Description	Reason for Confidential Treatment
1	Supplier Capabilities / Relationship	Ford Motor Company documents discussing its opinions of suppliers' capabilities and performance, or relating to Ford's commercial relationship with its supplier(s) (including specific terms and conditions under which parts or components are supplied).	Information concerning business relationships between Ford and suppliers could be used by competitors to identify and/or modify competitive strategies and strategic supplier partnerships without the need to invest the substantial resources invested by Ford.