



GENERAL MOTORS LLC
Global Interior and Safety Center

NHTSA
WASHINGTON, DC 20590

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August 11, 2011

OFFICE OF CHIEF
COUNSEL

O. Kevin Vincent, Esq. Chief Counsel
Office of Chief Counsel (NCC-111)
NHTSA, West Building W41-227
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Diesel HPFP Questions

Dear Mr. Vincent:

Enclosed with this letter are two copies of General Motors' (GM) response to questions received on July 25, 2011 from Mr. Jeffrey Quandt, NHTSA Office of Defect Investigations regarding diesel high pressure fuel pumps. GM is submitting this information on its own accord – it was not required to do so by any formal agency request or regulatory requirement. The information is being submitted voluntarily to Mr. Jeffrey Quandt, Chief, Vehicle Control Division, Office of Defect Investigations.

GM requests the documents stamped "GM Confidential Business Information", be afforded confidential treatment without a time limitation by the NHTSA. These are included in the electronic disk identified as ATT_2_GM_CONF. This information is a voluntary submission to the agency and is not customarily made public by GM, 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). 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 following identifies the specific type of confidential information contained in the documents:

DOCUMENT NAME	INFORMATION TYPES
Diesel_HPFP_8-10-2011-c.pdf	GM future product diesel fuel pump information



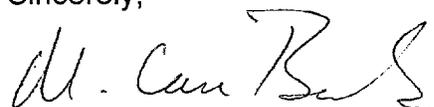
GM treats the above material as confidential proprietary information available only to authorized GM, supplier, and customer personnel who have a business need for them, and are not otherwise available to the public. These documents are maintained under a record-keeping system that is intended to control 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.

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 document subject to this request for confidentiality is being provided and has been clearly stamped "GM Confidential Business Information" on the disk label. If a request for disclosure of any or all of this information is received by the NHTSA, GM 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, please do not hesitate to call me.

Sincerely,



M. Carmen Benavides
Director, Product Investigations
and Safety Regulations

Enclosure

**CERTIFICATE IN SUPPORT OF
REQUEST FOR CONFIDENTIALITY**

I, M. Carmen Benavides, pursuant to the provisions of 49 CFR Part 512, state as follows:

- (1) I am Director of Product Investigations and Safety Regulations of GM Company 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 August 11, 2011 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 the 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 11th day of August 2011.



M. Carmen Benavides
Director, Product Investigations
and Safety Regulations



GENERAL MOTORS LLC
Global Interior and Safety Center

August 11, 2011

Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Ave., S. E., Room W48-307
Washington, D.C. 20590

Diesel HPFP Questions

Dear Mr. Quandt:

As you requested in your e-mail on July 25, 2011, General Motors is submitting a response to your questions related to diesel high pressure fuel pumps. GM is requesting confidentiality for this information and the response has been submitted to the NHTSA Office of Chief Counsel.

Please contact me or Dale Furney of my staff if you require additional information.

Sincerely,

M. Carmen Benavides
Director, Product Investigations
and Safety Regulations

