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National Highway Traffic Safety Administration/Enforcement  
Standard Operating Procedures

**Protecting Sensitive Information from Public Disclosure**  
*(Redaction)*

*Prepared by BLF Technologies, Inc.*

Change/Revision

Revision Number	Change Requested by	Request Date	Approved by
1	ODI Office Director	10.1.14	Frank Borris

Revision Number	Change Summary	Revision Date	Effective Date	Review Date
1	Updated procedure and added new criteria	10.1.14	10.1.14	10.10.14
2	Reformatted, edited and 10.14 changes	12.19.14	10.1.14	12.12.14

**TABLE OF CONTENTS**

I. PURPOSE .....1

II. SCOPE.....1

III. ROLES AND RESPONSIBILITIES .....1

IV. EXPERIENCE REQUIREMENTS.....2

V. PROCESSING INFORMATION and POLICY .....2

VI. REDACTING PERSONALLY IDENTIFIABLE INFORMATION (PII) AND OFFENSIVE LANGUAGE .....4

VII. ADD DISCLAIMER.....9

VIII. PROCEDURE.....12

    A. How to Redact with Adobe Acrobat..... 12

    B. Begin the Redaction Process..... 16

    C. Other Examples of Redaction ..... 25

IX. DEFINITIONS.....29

X. REFERENCES .....32

## I. PURPOSE

The purpose of this document is to provide a uniform procedure used to redact sensitive information (Personally Identifiable Information (PII)) from a file during the scanning process when the file is to be made available for public viewing.

1. Identify, assess and define the various document types that require redaction.
2. Define and document the specific criteria to redact documents based on predefined parameters that adhere to DOT/Chief Counsel requirements.

## II. SCOPE

This document describes the processes used to redact PII from complaints and comments, and documents of various types and formats that are received by the National Highway Safety Administration (NHTSA) from consumers with regards to safety issues involving their vehicles, tires, equipment, and/or child restraint systems.

Redaction is the process used to permanently delete or obscure sensitive information and inappropriate or offensive language, from files, in accordance with the various privacy laws, based on the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347), the Federal Information Security Management Act (FISMA), Department of Transportation (DOT) privacy regulations, Office of Management and Budget (OMB) mandates, and other applicable DOT Records Management procedures and guidance.

ARTEMIS (Advanced Retrieval, Tire, Equipment and Motor Vehicle Information System) is the database and Image Repository System developed to enable ODI managers, writers, screeners, analysts, investigators and engineers to meet statutory obligations and reporting requirements by storing complaint documents and making data accessible both privately (internal only) and publicly (internet accessible) in separate repositories.

The Public Image Repository allows review of these documents, after redaction, by the public; it is accessible on the Internet at <http://artemis.odi.nhtsa.dot.gov/>

## III. ROLES AND RESPONSIBILITIES

### Document Handlers:

- Redact information (PII), delete inappropriate or offensive language and add disclaimers, in accordance with this policy (SOP).
- Quality Control all documents twice before uploading to the Public Repository. (Quality Control is performed by someone other than the person making the initial redactions).
- Upload documents to the Public Repository.
- Maintain a Completion Log, in spreadsheet format, tracking; Receipt Date, Status (Public or Private Repository) and Completion Date.

#### IV. EXPERIENCE REQUIREMENTS

N/A

#### V. PROCESSING INFORMATION and POLICY

##### **Document Handling for Redaction**

Documents come to NHTSA in several forms; all must be subjected to the redaction process so that when made available to the public, individual privacy is maintained. How and where redaction is accomplished depends on the form in which the document is received, either in hardcopy or electronic format.

##### **Hardcopy Format (Paper)**

Must be scanned to a PDF-format and stored in the Artemis database. Before entering documents in Artemis, each document is redacted, in the Acrobat application, and then saved to the Artemis database, after a Document ID is assigned, by the ARTEMIS application the ID number facilitates easier searching and helps keep track of the particular complaint. Two Quality Control checks are done before uploading to the Artemis Public Repository where it can be view by the public. Quality control is completed by another person other than the person making the initial redactions.

**Note:** When redacting ‘personally identifiable information” (PII) on a document scanned into Acrobat, the document is reviewed, then the PII is covered with a black box (as described in section VII How To Redact PII).

##### **Electronic Formats**

- **IVOQs** – Internet Vehicle Owners Questionnaires - those entered directly in the Public Repository of Artemis by the public, through the Internet.
- **EVOQs** - Electronic Vehicle Owners Questionnaires those called into the Hotline and the Hotline staff enters the information into Artemis.
- **CD’s** – Compact Discs - information may be in the form of a spreadsheet to be uploaded into Artemis.
- **Email** - converted to PDF format then stored in Artemis.

These documents are be reviewed then redacted. (See the following lists for detailed document type descriptions). Documents are then quality control checked (QC’d) before uploading to the Artemis Public Repository or in the case of IVOQs and EVOQs they are taken from Artemis then QC’d and redacted if necessary.

**Note:** When redacting ‘personally identifiable information” (PII) on a document already entered in Artemis (Electronic) review and replace redacted information with a bold [XXX] (include brackets) so that the information is not identifiable.

**Note:** Confidential and Petition materials must be brought to the attention of the supervisor ASAP and the appropriate FTE staff assigned specifically to those materials will examine them and determine if they can be placed in the Public Repository.

**Note:** In accordance with contractor and office policy, the file(s) are uploaded to the Private or Public Repository or provided on a CD. A CD is prepared by request from the Government customer only.

### **Types of records commonly received by ODI:**

#### Hardcopy Records

- **Mailed-In Vehicle Owner's Questionnaires (MVOQ)** are questionnaires consumers use to report problems with their vehicles, tires, equipment, and or child restraint systems. This includes a consumer submitting additional information in support of an electronically submitted or telephoned VOQ (see below).
- **Police Accident Report (PAR)** is reports taken by law enforcement officers regarding a vehicle accident or defect resulting in a traffic hazard. PARs may include contact information for the consumer, as well as fatality, personal injury, property damage, weather conditions, primary causation factors, as well as accident and fatality ratio information.
- **Correspondence Letter/Consumer Letter** is written information about a consumer complaint often with supporting documentation such as letters, invoices and/or pictures.
- **Court Documents** are official court records generally submitted by a consumer in support of a VOQ.
- **Medical Records** include reports and other supporting medical documentation provided by the consumer.
- **Automotive service invoices and records** are documents related to automotive repair, service invoices and records provided to the consumer.
- **Photographs** are hardcopy images provided by the consumer.

#### Electronic Records

- **Internet Vehicle Owner's Questionnaire (IVOQ)** is a complaint form generated by a consumer on the NHTSA website on which they report a problem with a vehicle, tires, vehicle equipment and or child restraint systems.
- **Electronic Vehicle Owner's Questionnaire (EVOQ)** is a complaint telephoned to the Vehicle Safety Hotline. Hotline staff receives calls and enters information provided by the consumer into the Artemis database. The information entered in Artemis is electronically captured on an EVOQ.
- **Manufacturer's Information Request Response** is databases and or spreadsheets sent to NHTSA provided by a manufacturer, usually on compact disc, in response to ODI's information request.
- **Electronic Mail (E-mail)** is electronic mail correspondences relative to NHTSA and/or ODI activities.

**VI. Redacting Personally Identifiable Information (PII) and Offensive Language**

The use of inappropriate or offensive language in the context of the Complaint Description section should be brought to the attention of the Supervisor for determination of further action (editing, retain original text, review by Artemis Program Manager, review by the Director of CRD, referral to Chief Counsel’s Office, etc.)

Inappropriate or offensive language includes, but is not limited to, any language or content that is sexually oriented, sexually suggestive or abusive, harassing, defamatory, vulgar, obscene, profane, hateful, or that contains racially, ethnically or otherwise objectionable material of any kind.

Should an item in the Description field be deemed to contain inappropriate or offensive language, the text should be removed and replaced with “!@#%”.

The following chart (Figure 1) lists the information to be redacted for the major document types as well as information not to redact, according to the policy set by NHTSA’s Chief Counsel Office.

Document Types	Information Redacted	Not Redacted
<p>Consumer Complaints/ Correspondence letters/Congressional letters/Petition letters/Newspaper excerpts/Other supporting documents</p>	<p>Names Street addresses Zip or postal codes Social Security numbers Dates of birth Ages Driver's license numbers Family/friend names Faces/injuries/deceased bodies in photos Car tags or license plate numbers (private vehicles only) Phone numbers – home, business, fax and mobile numbers Signatures from the consumer, family, friends, or witnesses Insurance claim numbers Insurance policy numbers Warranty/Invoice claim numbers Junkyard/Insurance claim centers stock numbers (usually painted on vehicles) Bank account numbers Credit card numbers Last 6 digits of the VIN Foreign VIN last 6 digits E-mail addresses VIN barcode (part of barcode) Citation numbers Police accident report case number Court reference numbers</p>	<p>State City First 11 characters of VIN number Car tags or license plates of commercial vehicles Names and addresses of parties acting in their official capacity (e.g., lawyers, doctors, automobile dealers, automotive service businesses, police officers, EMT, coroners, nurses, government officials, Judges etc.)</p>



<p>Death Certificates, Autopsy Reports or other information related to deceased individuals</p>	<p>Names                  Street addresses                  Zip or postal codes                  Social Security numbers                  Dates of birth                  Ages                  Driver's license numbers                  Family/friend names                  Faces/injuries/deceased bodies in photos                  Car tags or license plate numbers (private vehicles only)                  Phone numbers – home, business, fax and mobile numbers                  Signatures from the consumer, family, friends, or witnesses                  Insurance claim numbers                  Insurance policy numbers                  Last 6 digits of the VIN                  Foreign VIN last 6 digits                  E-mail addresses                  VIN barcode (part of barcode)                  Citation numbers                  Police accident report case number                  Any unique identifier for death certificates/autopsy reports (e.g. Report number)</p>	<p>State                  City                  First 11 characters of VIN number                  Car tags or license plates of commercial vehicles                  Names and addresses of parties acting in their official capacity (e.g., lawyers, doctors, automobile dealers, automotive service businesses, police officers, EMT, coroners, nurses, government officials, Judges etc.)</p>
<p>Medical Records, such as, doctor reports and medical reports</p>	<p>Replace with disclaimer page                  (See page 8)</p>	<p>Replace with disclaimer page                  (See page 8)</p>

<p>Work Orders/Repair Invoices/Warranty Information/Insurance claims</p>	<p>Names                  Street addresses                  Zip or postal codes                  Social Security numbers                  Dates of birth                  Ages                  Driver's license numbers                  Family/friend names                  Car tags or license plate numbers (private vehicles only)                  Customer phone numbers – home, business, fax and mobile numbers                  Signatures from the customer                  Insurance claim numbers                  Insurance policy numbers                  Bank account numbers                  Credit card numbers                  Last 6 digits of the VIN                  Foreign VIN last 6 digits                  E-mail addresses</p>	<p>State                  City                  First 11 characters of VIN number                  Car tags or license plates of commercial vehicles                  Names and addresses of parties acting in their official capacity (e.g., lawyers, doctors, automobile dealers, automotive service businesses, police officers, EMT, coroners, nurses, government officials, Judges etc.)</p>
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<p>Lawsuit Documents (Depositions, complaints, other supporting documents etc.)</p>	<p>Names Street addresses Zip or postal codes Social Security numbers Dates of birth Ages Driver's license numbers Family/friend names Faces/injuries/deceased bodies in photos Car tags or license plate numbers (private vehicles only) Phone numbers – home, business, fax and mobile numbers Signatures from the consumer, family, friends, or witnesses Insurance claim numbers Insurance policy numbers Warranty/invoice claim numbers Junkyard/Insurance claim centers stock numbers (usually painted on vehicles) Bank account numbers Credit card numbers Last 6 digits of the VIN Foreign VIN last 6 digits E-mail addresses VIN barcode (part of barcode) Citation numbers Police accident report case number Accident incident date Mile markers Street names (where the accident occurred) PII in lawsuit caption if PII is of individuals not acting in official/commercial capacity Court reference number Witness PII: e.g. name, address, telephone, DOB, faces, signatures etc.</p>	<p>Lawyers involved in the lawsuit Names and addresses of commercial organizations Names and addresses of parties acting in their official capacity (e.g., lawyers, doctors, automobile dealers, automotive service businesses, police officers, EMT, coroners, nurses, government officials, Judges etc.)</p>
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<p>Petition Information found in pursuits (i.e. DP investigation files)</p>	<p>Petitioner’s address (including city and State)          Telephone number          Zip or Postal Codes          Social Security numbers          Dates of Birth          Age          Driver’s License numbers          Family/Friend names          Third-party names and witness information          Street Addresses          Faces/injuries/deceased bodies in photos          Car tags or license plate numbers          Phone numbers, home, business, fax and mobile numbers          Signatures from the consumer, family, friends, or witnesses          Insurance claim numbers          Bank account numbers          Credit card numbers          Last 6 digits of the VIN          E-mail addresses          Foreign VIN last 6 digits          VIN barcode (part of barcode)</p>	<p>Petitioner’s Name(s)          Names and addresses of parties acting in their official capacity (e.g., lawyers, doctors, automobile dealers, automotive service businesses, police officers, EMT, coroners, nurses, government officials, Judges etc.)</p>
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**Figure 1** – Table describing information to redact or not redact according to the document type and per current redaction policy.

**For Medical Records and Videos**

Instead of redacting PII for medical records and videos, replace the entire file with the appropriate disclaimer page.

**For medical report files:**

*To protect the privacy of individuals, NHTSA does not make medical records available to the public without authorization. For this reason, documents falling into this category have not been included in this complaint record.*

**For Videos:**

*To protect the privacy of individuals, NHTSA does not make Videos that contain Personal Identifying Information available to the public without authorization. For this reason, Videos falling into this category have not been included in this complaint records.*

VII. Add Disclaimer

After redacting a document, place a Disclaimer (redaction policy) on the page. Choose the disclaimer statement according to the correct exemption (see Exemption List (page 11)). Choose placement of the disclaimer according to document type, see the following examples.

Form Approved: OMB No. 2127-0048

<b>DOT Auto Safety Hotline</b> <b>Vehicle Owner's Questionnaire</b> To Report Vehicle Safety Defects 1-888-DASH-2-DOT (1-888-327-4236) INTERNET: www.nhtsa.dot.gov/hotline		FOR AGENCY USE ONLY 100148	
		Date Received 15-JUN-2010	Repository <input type="checkbox"/> Reference No. 10336447
<b>OWNER INFORMATION (Type or Print)</b>			
Name [REDACTED]		Daytime Telephone Number [REDACTED]	
Address [REDACTED]		E-mail Address [REDACTED]@AOL.COM	
City [REDACTED]	State MA	Zip Code 01907	
The information you provide will be used to identify potential safety-related defects. We may share your information with the applicable vehicle manufacturer during an investigation or recall in accordance with the routine use described in the agency's Privacy Act notice. See 49 FR 53971 (Sep. 3, 2004).			
<b>VEHICLE INFORMATION</b>			
17 digit Vehicle Identification Number Located at bottom of windshield on driver's side 1HGHM66SX44007806		Make HONDA	Model ACCORD
Date Purchased	Dealer's Name and Telephone Number		Model Year 2004
Original Owner <input type="checkbox"/>	Dealer's City	State	Fuel Type:
Transmission Type <input type="checkbox"/> Antilock Brakes <input type="checkbox"/> Cruise Control	Powertrain	Multiple Failure: 1	Incident Date(s) 10-JUN-2010
<b>FAILED COMPONENT(S)/PART(S) INFORMATION</b>			
Vehicle Component Code: 103000 POWER TRAIN: AUTOMATIC TRANSMISSION		Failure Mileage 91000	Failure Speed 60
<b>ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A TIRE FAILURE</b>			
Tire Make	Tire Model (Name or Number)	Tire Size (Example P215/65R15)	
DOT No. (Example: DOTM1A9ABC036)	<input type="checkbox"/> Original Equipment <input type="checkbox"/> Prior Repair	Failure Location:	
Tire Component Code		Tire Failure Type:	
<b>ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A CHILD SEAT FAILURE</b>			
Make:	Date Manufactured:	Model No./Name:	
Seat Type:	Installation System:		
Child Seat Component Code:		Failed Part:	
<b>APPLICABLE INCIDENT INFORMATION</b> (Please describe in detail the incident(s), failure(s), crash(es), and injury(ies).)			
Crash <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Fire <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Number of Persons Injured	Number of Deaths
		Reported to Police N	
Narrative Description of Incident(s), Crash(es), and Injury(ies). Please describe (1) events leading up to the failure, (2) failure and its consequences, and (3) what was done to correct the failure; i.e. parts repaired or replaced (and if old part is available).			
WE WERE LUCKY THAT WE WEREN'T KILLED! 2004 HONDA ACCORD EXL 6CYL VIN# [REDACTED]. WE WERE TRAVELING ON ROUTE 95 NORTH OF BOSTON IN THE MIDDLE LANE AT AN APPROX. SPEED OF 60 MPH ON JUNE 10, 2010 AT APPROX. 6:15PM. I WENT TO PASS THE CAR IN FRONT OF US AND STARTED TO PULL INTO THE PASSING LANE ON THE LEFT. SUDDENLY, THE CAR JERKED VIOLENTLY AND SLOWED DOWN SUDDENLY. THE CAR IN BACK OF US ALMOST HIT US AND SWERVED INTO THE LANE ON THE RIGHT TO AVOID HITTING OUR CAR. THE OTHER DRIVER WAS ALMOST RUN OVER BY A SEMI TRUCK WHO JAMMED ON HIS BRAKES. I THOUGHT HE (THE TRUCK) WAS GOING TO JACK KNIFE. I SEE THAT THIS TRANSMISSION PROBLEM IS A RECALL ITEM FOR HONDA. THE HONDA DEALER (KELLEY HONDA IN LYNN, MASS.) SAYS THAT THEY WILL NOT HELP US FINANCIALLY TO REPLACE THE TRANSMISSION. THE CAR HAS 90,000 MILES AND IS IN GOOD SHAPE OTHERWISE. WE ARE VERY UPSET AT HONDA'S REACTION TO THIS SAFETY FAILURE AND WE FEEL STRONGLY THAT THE US GOV'T SHOULD STEP IN BEFORE PEOPLE ARE NEEDLESSLY KILLED IN CARS WITH THIS TRANSMISSION. WE ALSO NOTE ON THE INTERNET THAT THERE ARE TONS OF PEOPLE WITH THE SAME PROBLEM AND VERY DANGEROUS EXPERIENCES. PLEASE HELP AND GET THE WORD OUT! [REDACTED]			
Include, if available: Police/Fire Department Report, Photos, and Repair Invoice. <span style="float: right;">ATTACH ADDITIONAL SHEETS IF NECESSARY</span> The Privacy Act of 1974 (Public Law 93-579) This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a Manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.			

Figure 2 – EVOQ redaction and Disclaimer placement (circled in red) example.

Use the following disclaimer when a modification is made to the original document (redaction).

**“INFORMATION Redacted PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6).”**

Make the disclaimer bold and place it on a separate line of the description field, top of the document (example spreadsheet) or insert the disclaimer on the bottom of the (IVOQ) description field, to avoid blocking more important details, when the mouse is over the complaint file in the search result field.

1	A	B	C	D	E	F	G	H
1	VIN	MAKE	MODEL	YEAR	DATE	IN SERVICE	STATE	
2	<b>INFORMATION Redacted PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)</b>							
3	JNKAY41E03M00000X	NISSAN	M45	2003	08-Jan-02			
4	JNKAY41E03M00000X	NISSAN	M45	2003	31-Jul-02	08-May-04	GA	
5	JNKAY41E03M00000X	NISSAN	M45	2003	27-Jul-02	29-May-03	IL	
6	JNKAY41E03M00000X	NISSAN	M45	2003	24-Jul-02	11-Oct-03	OR	
7	JNKAY41E03M00000X	NISSAN	M45	2003	27-Jul-02	28-Feb-04	CA	
8	JNKAY41E03M00000X	NISSAN	M45	2003	25-Jul-02	12-May-04		
9	JNKAY41E03M00000X	NISSAN	M45	2003	25-Jul-02	18-Oct-03	NY	
10	JNKAY41E03M00000X	NISSAN	M45	2003	29-Jul-02	21-Oct-03	MA	
11	JNKAY41E03M00000X	NISSAN	M45	2003	25-Jul-02	28-Jun-03	IU	
12	JNKAY41E03M00000X	NISSAN	M45	2003	26-Jul-02	15-Nov-02	CA	
13	JNKAY41E03M00000X	NISSAN	M45	2003	26-Jul-02	11-Sep-03		
14	JNKAY41E03M00000X	NISSAN	M45	2003	26-Jul-02	11-Jul-03	CA	
15	JNKAY41E03M00000X	NISSAN	M45	2003	29-Jul-02	12-Feb-03	NY	
16	JNKAY41E03M00000X	NISSAN	M45	2003	26-Jul-02	16-Nov-02	NY	
17	JNKAY41E03M00000X	NISSAN	M45	2003	02-Aug-02	26-Mar-03	AL	
18	JNKAY41E03M00000X	NISSAN	M45	2003	26-Jul-02	19-Jun-03	GA	
19	JNKAY41E03M00000X	NISSAN	M45	2003	29-Jul-02	12-Nov-03	FL	
20	JNKAY41E03M00000X	NISSAN	M45	2003	30-Jul-02	15-Dec-03	PA	
21	JNKAY41E03M00000X	NISSAN	M45	2003	31-Jul-02	16-Feb-04	WI	
22	JNKAY41E03M00000X	NISSAN	M45	2003	26-Jul-02	04-Oct-02	TX	
23	JNKAY41E03M00000X	NISSAN	M45	2003	27-Jul-02	07-Feb-03	CT	
24	JNKAY41E03M00000X	NISSAN	M45	2003	02-Aug-02	03-Jul-03	NC	
25	JNKAY41E03M00000X	NISSAN	M45	2003	31-Jul-02	20-Dec-02	FL	
26	JNKAY41E03M00000X	NISSAN	M45	2003	31-Jul-02	11-Apr-03	VA	
27	JNKAY41E03M00000X	NISSAN	M45	2003	02-Aug-02	30-Sep-03	VA	
28	JNKAY41E03M00000X	NISSAN	M45	2003	30-Jul-02	20-Jan-03	OH	

Figure 3 - Disclaimer placement/XXX redaction on database, supplied on CD.

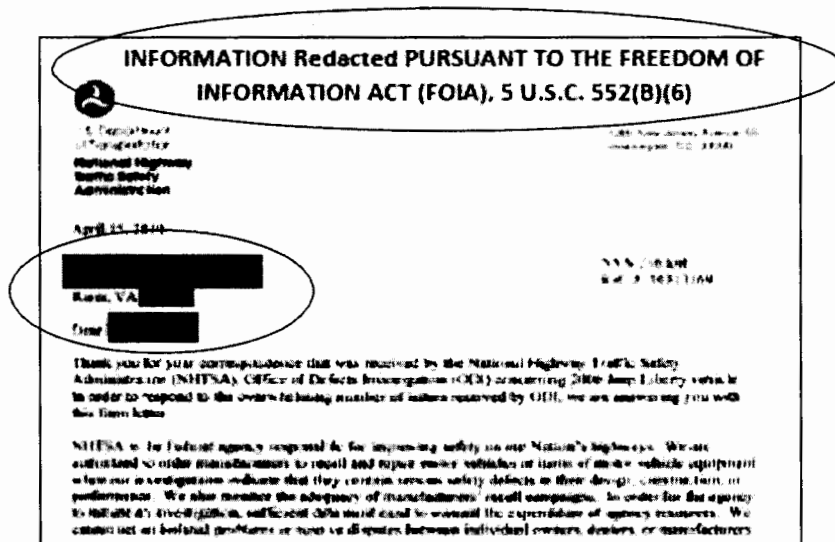


Figure 4 – Disclaimer placement and redaction on Correspondence Response Letter.

**Note:** Information is redacted based on NHTSA Chief Counsel's finding of confidential treatment. Usually, redactions are based on exemption 4 or 5 U.S.C. 552(b)(4). Some basis may vary; therefore, use the appropriate numbered exemption by checking the list below (page8).

"INFORMATION Redacted PURSUANT TO THE FREEDOM OF INFORMATION ACT  
(FOIA), 5 U.S.C. 552(B)(4)

"INFORMATION Redacted PURSUANT TO THE FREEDOM OF INFORMATION ACT  
(FOIA), 5 U.S.C. 552(B)(5)

**Exemptions List** (Excerpt from Freedom of Information Act, 5 U.S.C §552)

*Possible Exemptions;*

This section does not apply to matters that are:

- (1)(A) Specifically authorized under criteria established by an Executive order to be kept secret in the interest of national defense or foreign policy and (B) are in fact properly classified pursuant to such Executive order;
- (2) Related solely to the internal personnel rules and practices of an agency;
- (3) Specifically exempted from disclosure by statute (other than section 552b of this title), provided that such statute (A) requires that the matters be withheld from the public in such a manner as to leave no discretion on the issue, or (B) establishes particular criteria for withholding or refers to particular types of matters to be withheld;
- (4) Trade secrets and commercial or financial information obtained from a person and privileged or confidential;
- (5) Inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency;
- (6) Personnel and medical files and similar files which, if disclosed would constitute a clearly unwarranted invasion of personal privacy
- (7) Records or information compiled for law enforcement purposes, but only to the extent that the production of such law enforcement records or information (A) could reasonably be expected to interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of a confidential source, including a State, local, or foreign agency or authority or any private institution which furnished information on a confidential basis, and, in the case of a record or information compiled by a criminal law enforcement authority in the course of a criminal investigation or by an agency conducting a lawful national security intelligence investigation, information furnished by a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law, or (F) could reasonably be expected to endanger the life or physical safety of any individual;

VIII. PROCEDURE

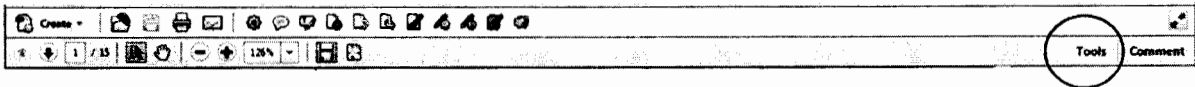
A. How to Redact with Adobe Acrobat

Redaction requires performing a series of steps to apply various redaction marks that cover PII on a document. This first section describes the way to create an ACTION used to assign the needed steps to a button that can then be used to apply those steps with one click, instead of clicking several step each time the marks are to be used. Begin the redaction activity by creating an ACTION (also called a batch sequence) button.

**Note:** Once the action is applied, the redacted document is considered *sanitized* also the file size is reduced.

Create a New Action (Batch Sequence) Button

- 1. Open an Adobe Acrobat (pdf) document and select **Tools**, on the menu bar.



- 2. Select **Action Wizard** and then **Create New Action**, The Create New Action window will open.

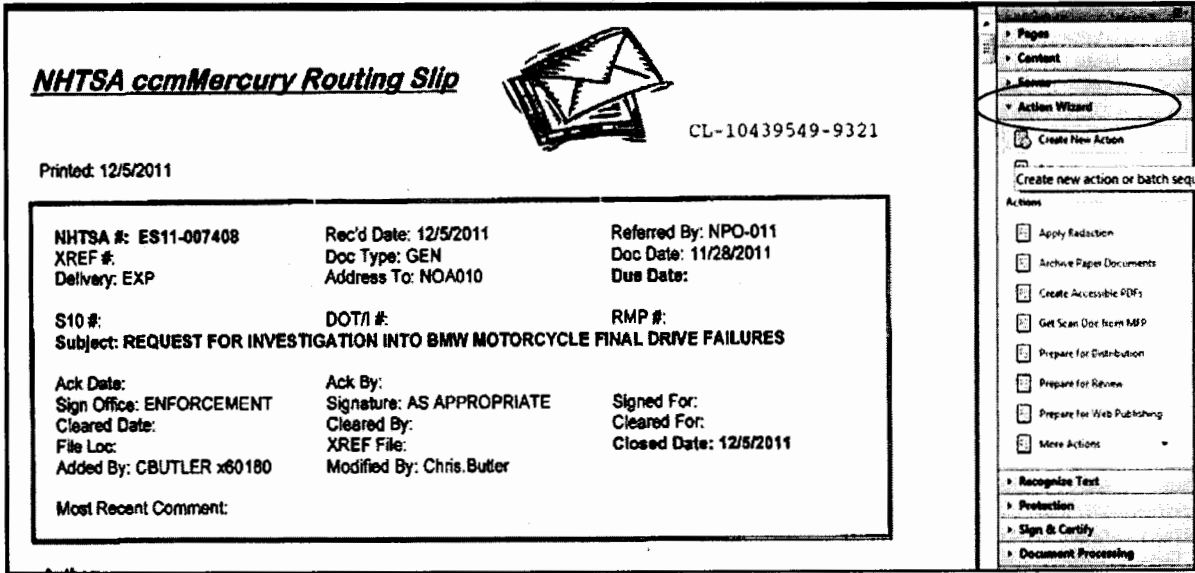


Figure 5 - Tools, then Action Wizard.

**Note:** Keep the option - Start with: A File Open in Acrobat

3. Next, add the instruction steps.

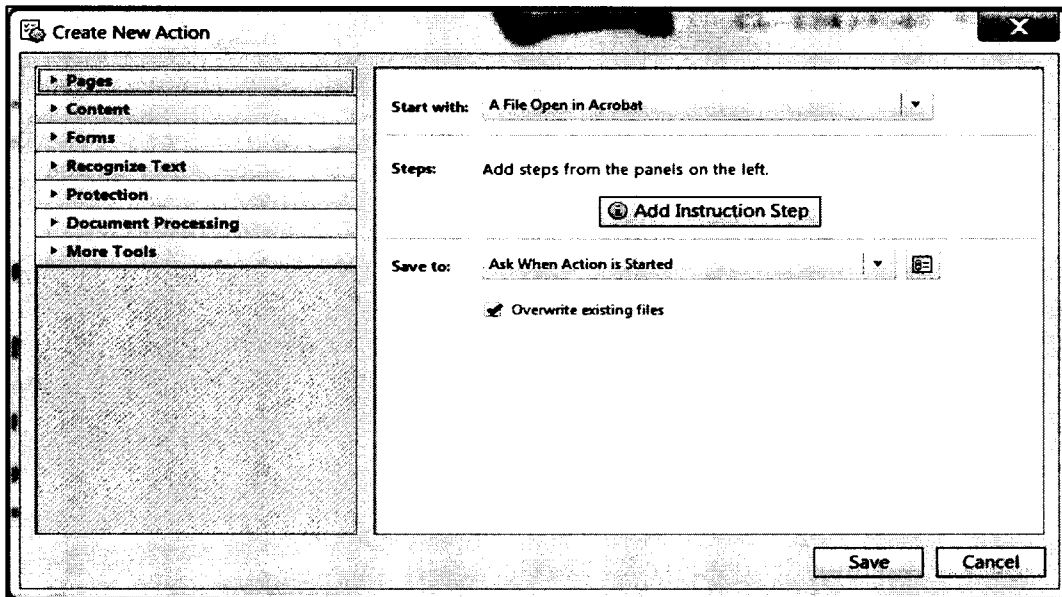


Figure 6 – Add Instruction Step

4. Select **Protection** on the Create New Action menu and the window will expand, then;

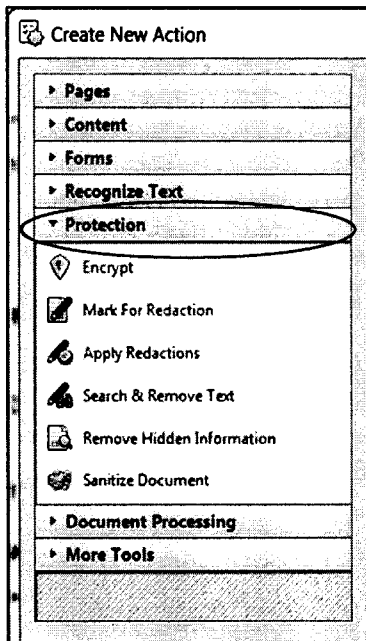


Figure 7 - Open the Protection area to move to the next step.



5. Single click on **Apply Redaction** and **Sanitize Document** and these steps will be added to the Steps section

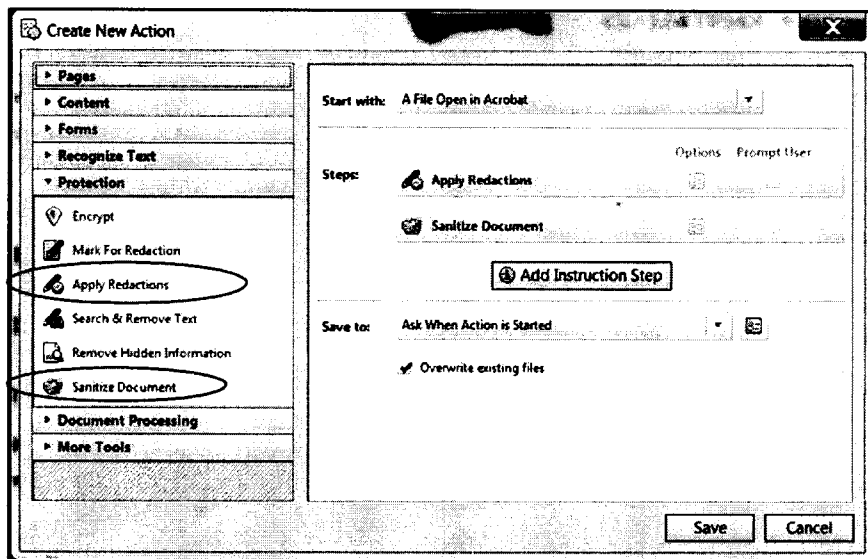


Figure 8 – Apply Redactions and Sanitize Document (add these to the action instructions).

6. Select the **Document Processing** drop down button and select **Reduce File Size**. This will also be added to the Steps menu:

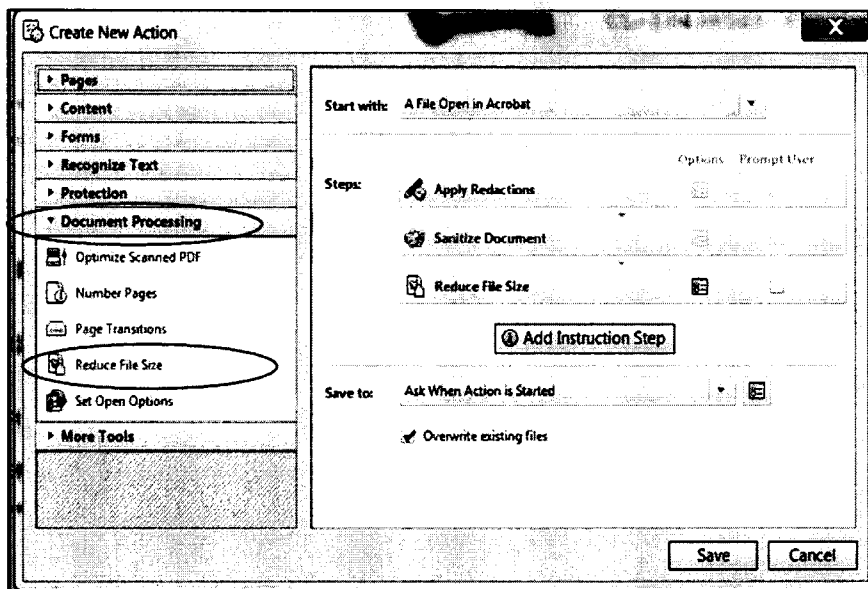


Figure 9 - Under Document Process and select Reduce File Size.

7. **Save to:** Click on the down arrow and this window will open with the option to choose where the file should be saved:
8. Choose the option: **The same Folder selected at Start.**

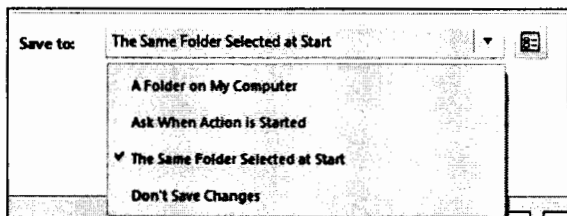
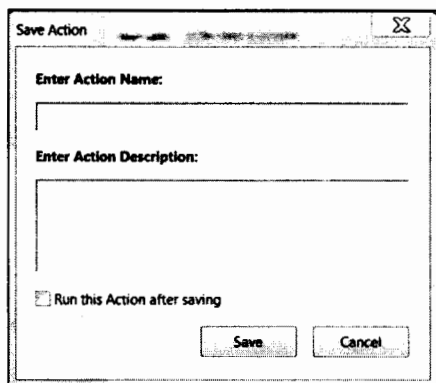


Figure 10 – Be sure to check, The Same Folder Selected at Start.

9. Click on the **Save** button and a Save Action Window will open then



**Enter Action Name:**  
Apply Redaction

**Enter Action Description:**  
Apply Redaction  
Sanitize Document  
Reduce File Size

Figure 11 – Enter Action Name and Action Description.

The Save Action window will look like this once the actions are inserted:

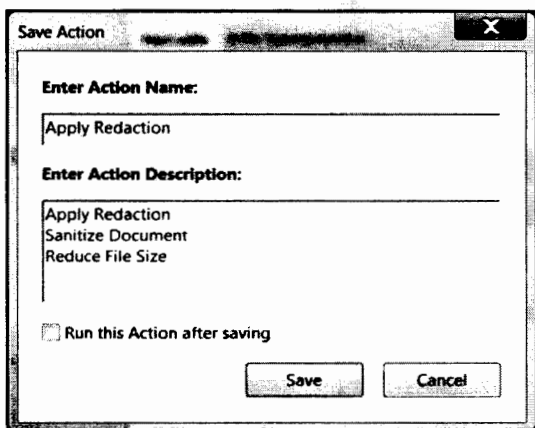


Figure 12 – Actions entered.

**Note: DO NOT** check - Run this Action after saving.

10. Select the **Save** button once the entries are in place.

There should now be a **New Action** on the Action Wizard menu called **Apply Redaction**

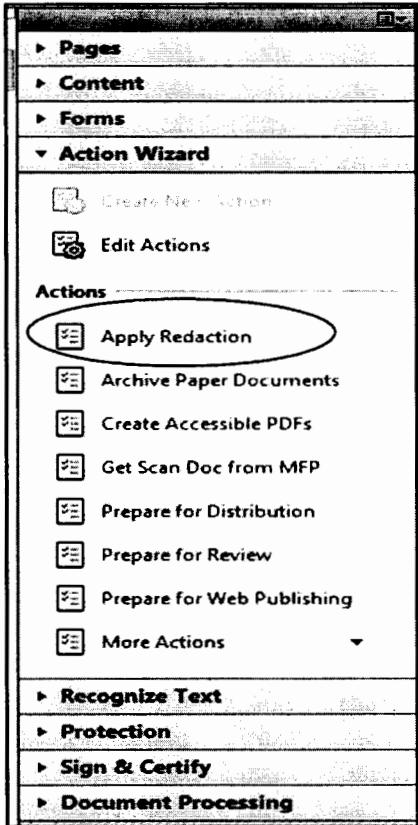


Figure 13 – See the Action button in the lineup.

**B. Begin the Redaction Process**

Having created the Action Button, next:

1. Customize the Tool Bar by adding icons for the commands that will be used regularly in the redaction process. (This will enable efficiency and save time when redacting sometimes pages of documents).
2. To add icons to the first row of tool icons, right click on the Toolbar and choose **Quick Tools**. (Figure 16).  
Or, use the Tools dropdown menu choose View --> Tools --> Protection (Figure 14).  
Or, use the quick tools by clicking TOOLS on the lower tool bar (Figure 16).

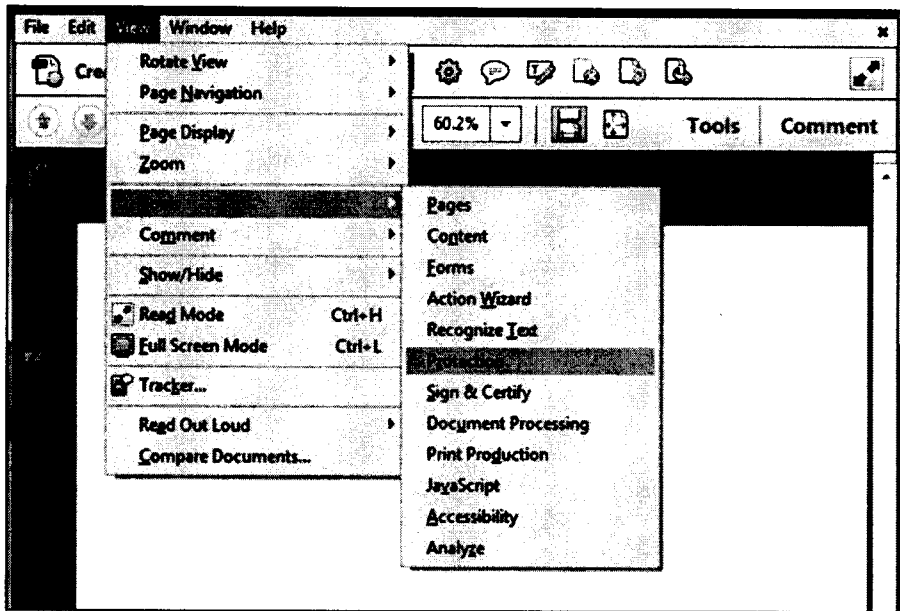


Figure 14 – View ---> Protection ---> Continue to assign actions...

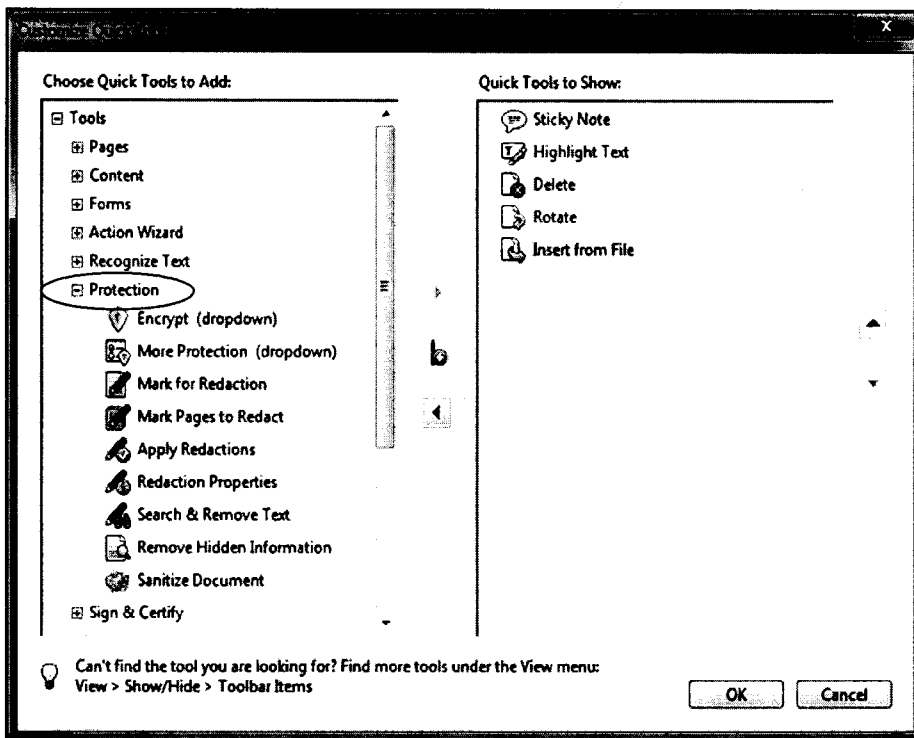


Figure 15 - Follows Figure 14.

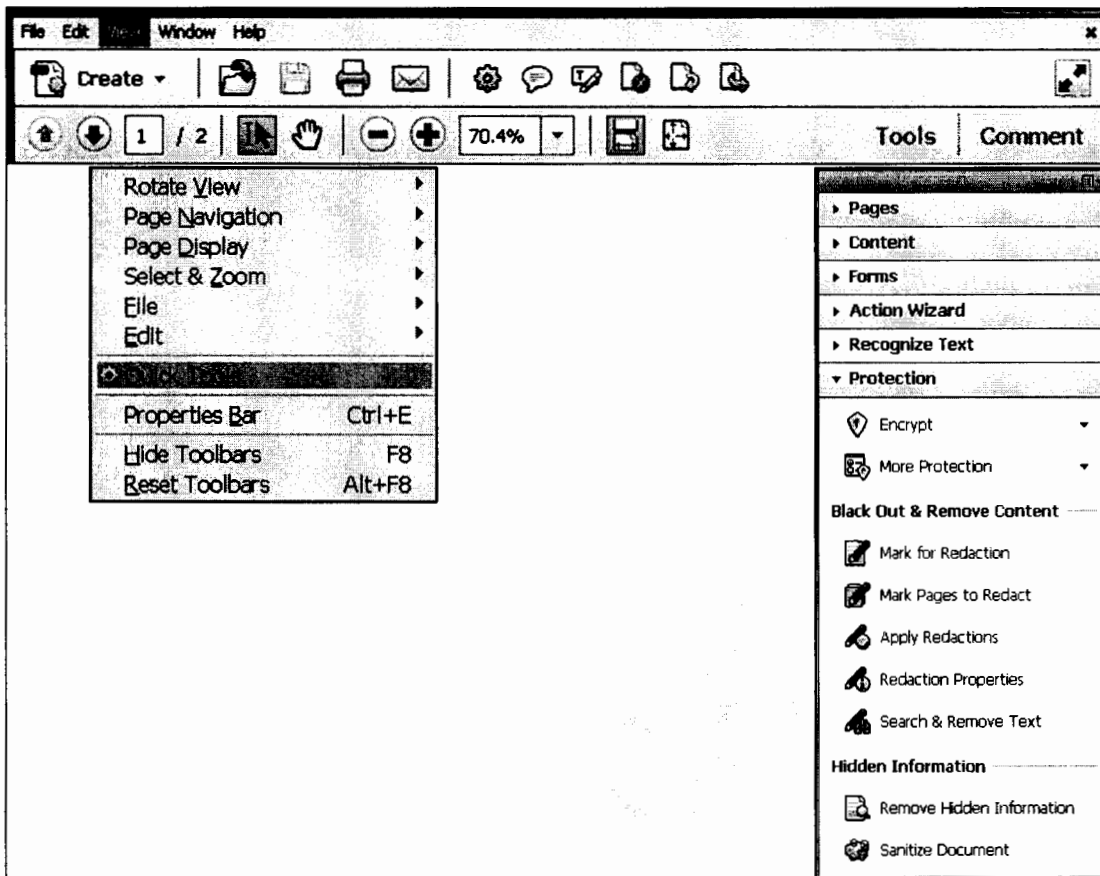


Figure 16 - Tools --->Quick Tools ---> Protection.

Use any of these methods to open the Protection area in order to add icons for customization

- At the **Customize Quick Tools** window, click on a tool then click on the center right arrow (as circled below). Click Ok and the icons will appear on the top row tool bar. (Figure 18).

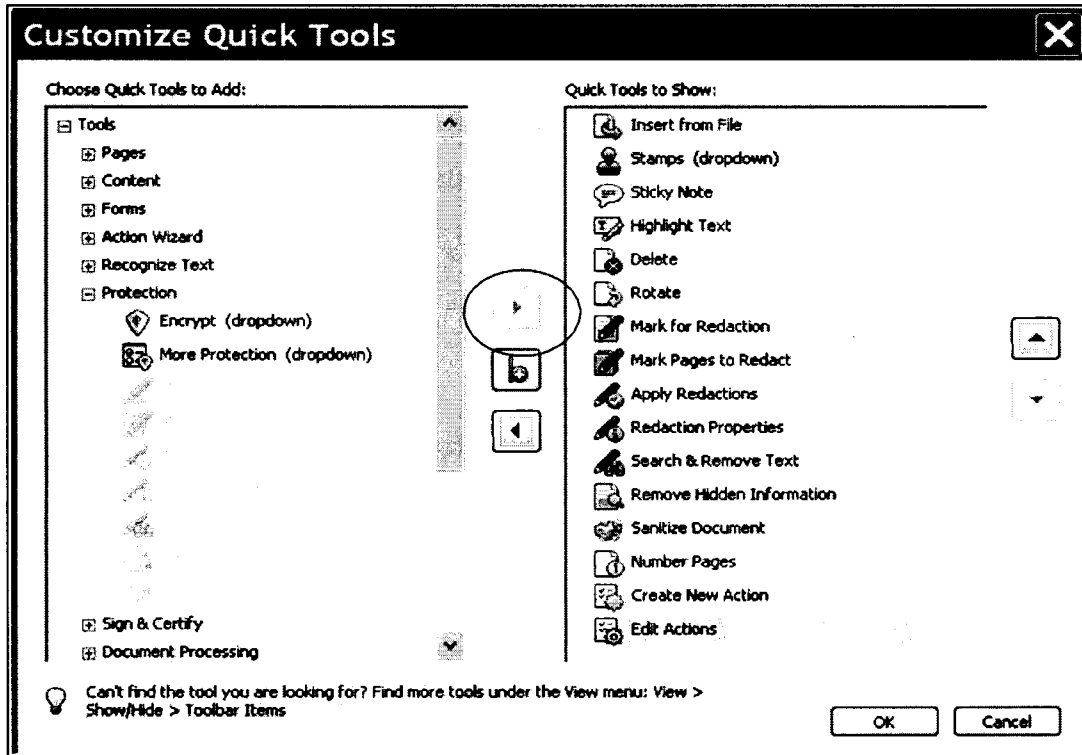


Figure 17 - Add tools from the Protection side to the Quick tools bar.

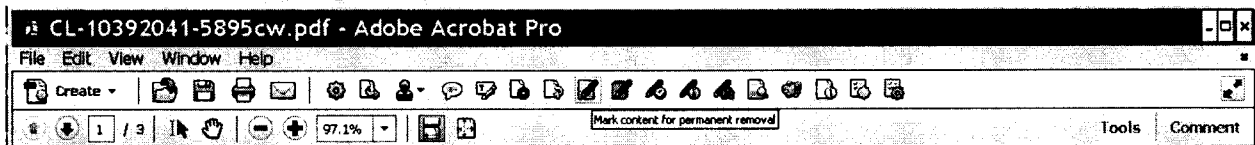


Figure 18 - Redaction icons now on the top toolbar.

4. Set the redaction box color to Black

Mark for Redaction --> Redaction Properties ---> Redacted Area Fill Color ---> Choose Black

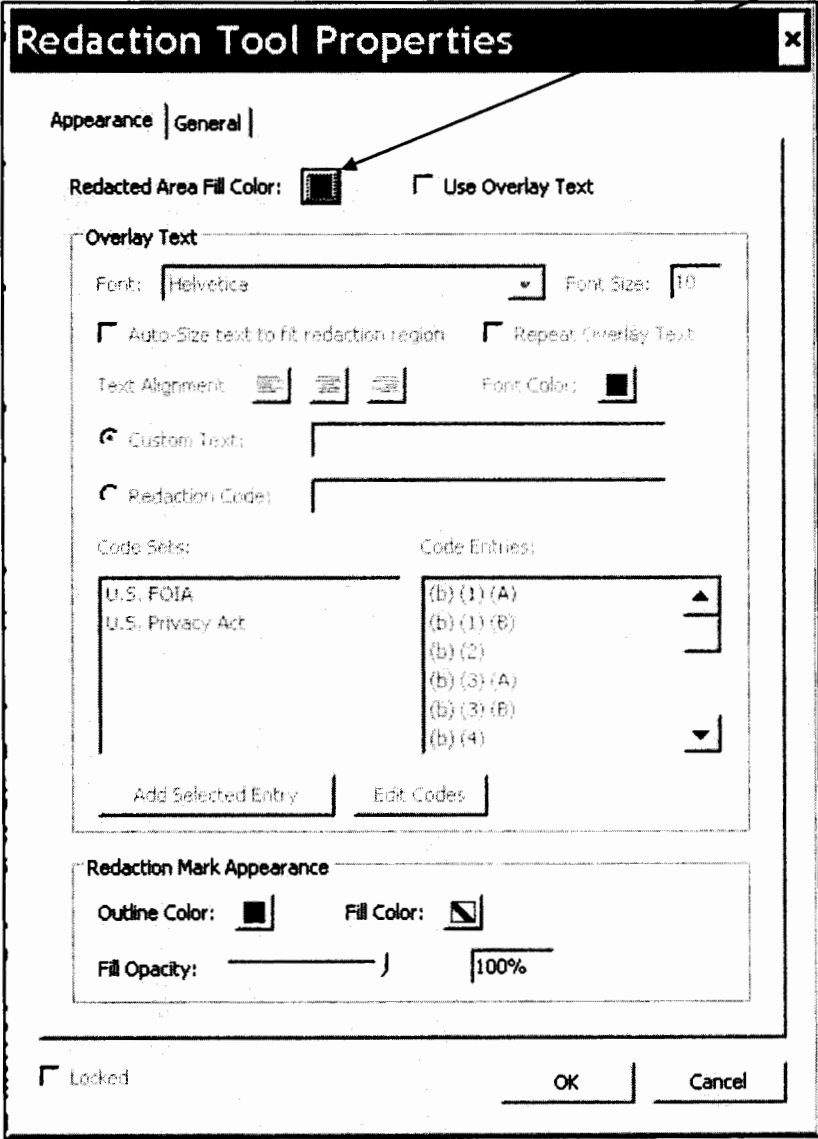


Figure 19 – Redacted area fill color under Tool Properties.

Redact:

1. Create a C:/Working Folder/Public folder on the C: drive to store saved files.

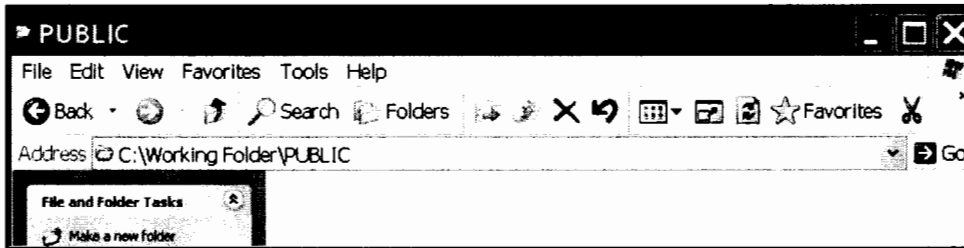


Figure 20 - Public working folder.

2. Open the document file and click on the **Mark for Redaction** icon, the cursor will change to a plus sign.
3. While holding down the left button on the mouse, drag the plus sign over the area that's being redacted and a red square will highlight the redaction area.

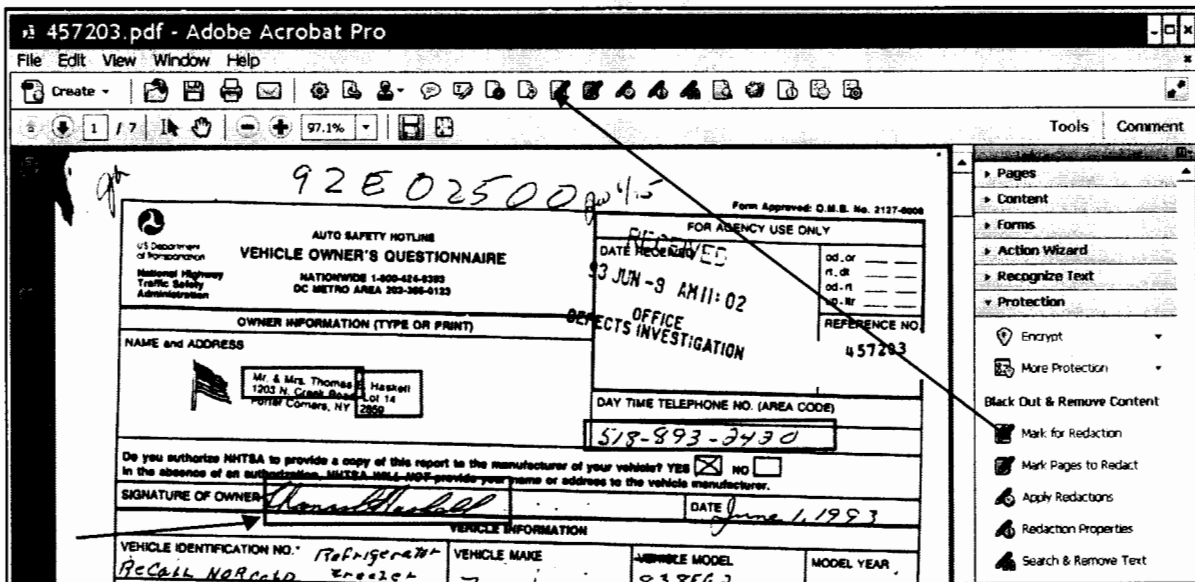


Figure 21 - Mark for Redaction.



4. Click **Apply Redaction**. This will create a *black box* where the redlined selection was made.

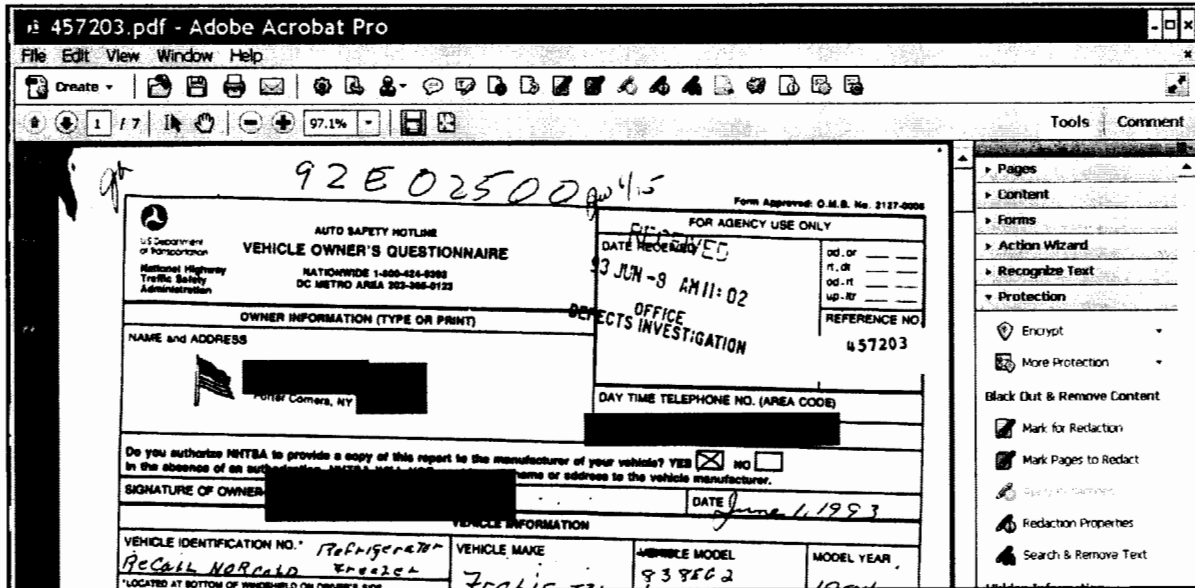


Figure 22 - Redaction applied, redaction area is now covered with a black box.

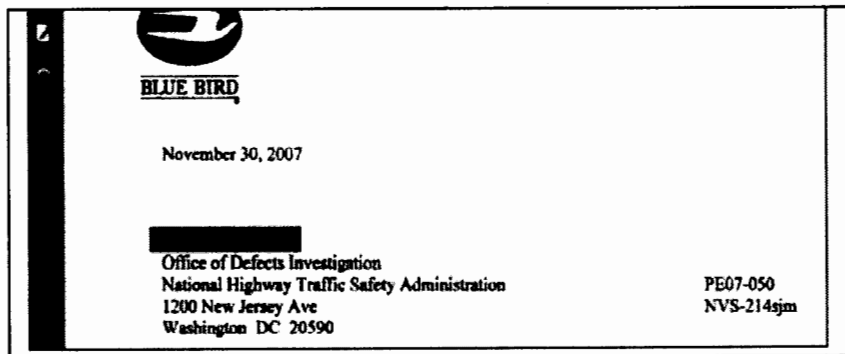


Figure 23 - Another example of redaction applied area covered with a black box.

5. After all of the redaction marks have been applied, permanently redact the entire page by selecting the OK button (Figure 10).

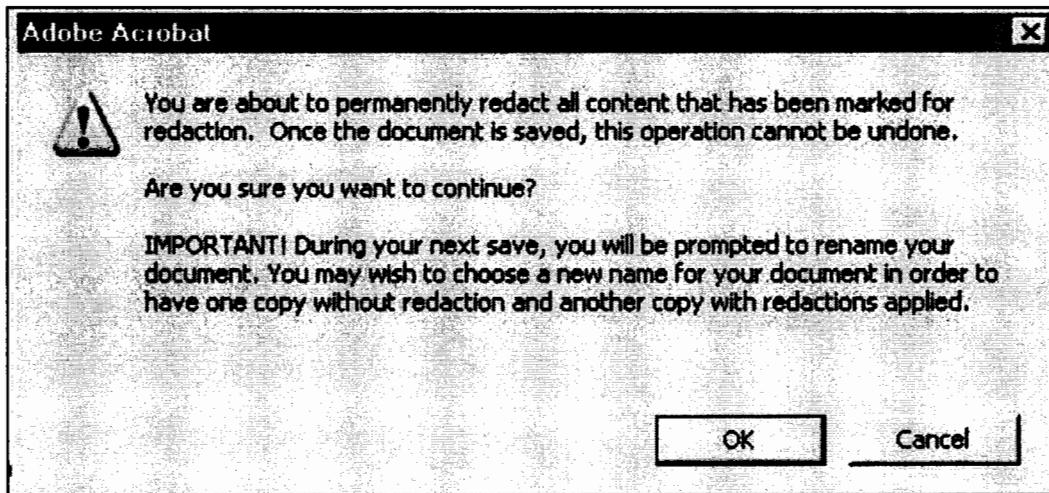


Figure 24 - OK button to make reduction permanent.

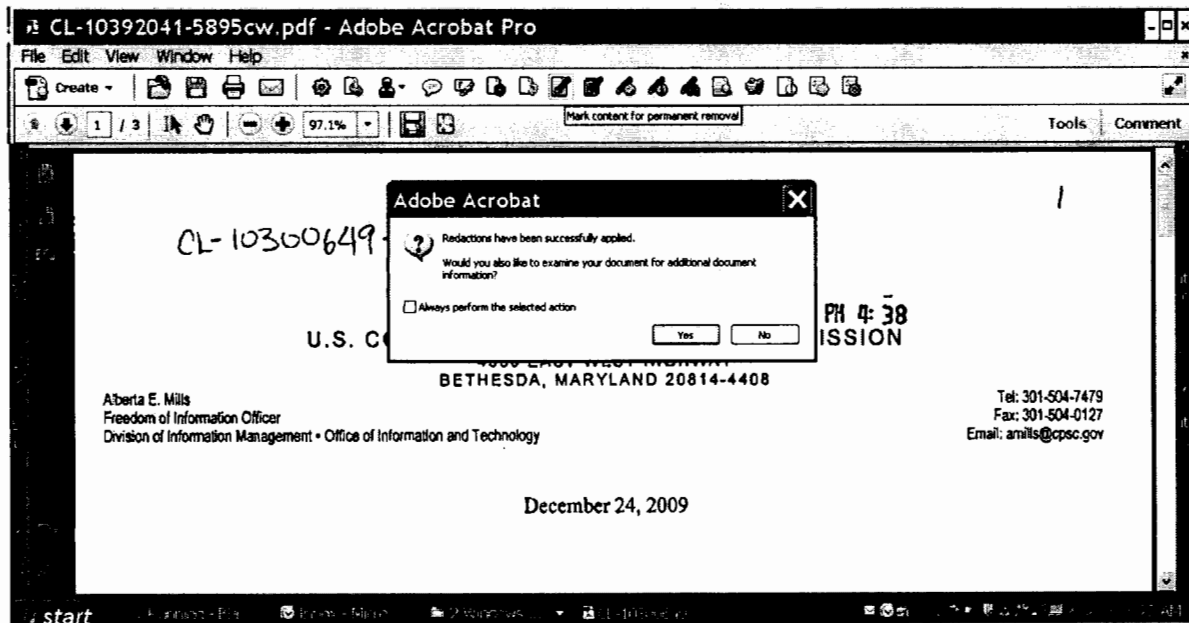


Figure 25 - Final redaction screen.

6. Redaction has been successfully applied. Would you like to examine your document for additional document information? Select NO. Continue on to save the redacted document.

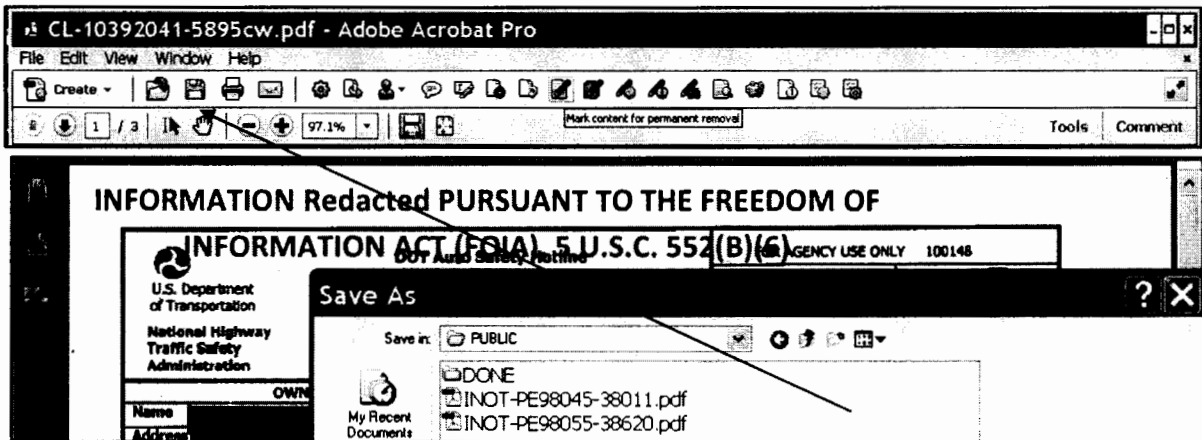


Figure 26 - Save icon and file window.

7. Select the Save icon or use **File --- > Save As**.
8. Then select **Save**.
9. Select **Yes**. The file will be saved in the same location as the original file (C:/Working Folder/Public).

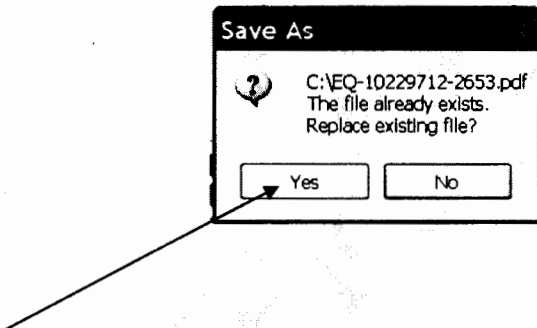


Figure 27 – Click Yes to save.

**Note:** Once files have been redacted and quality controlled by another individual, files are then uploaded to the Public or Private Repositories of the Artemis Database, where they are viewable by the public or within NHTSA. The process for this upload is explained in detail in the Scanning SOP. Access to other SOP's discussed in the Reference section of this document.

C. Other Examples of Redaction

The areas marked in black below show where information was redacted (figures)

**SR Detail (Query)**

**SR Number:** 1-12424386     timing chain/valves

**Contact Name:** [REDACTED]

**Contact Role:** Owner

**Account/Rtr:** [REDACTED]

**Address:** [REDACTED]

**City:** Winneconne     **State:** WI

**Postal Code:** [REDACTED]     **Country:** USA

**Work Phone:** [REDACTED]     **Home Phone:** [REDACTED]

**Email:** [REDACTED]

**VIN:** 1G8JS52F6Y [REDACTED]

**Mileage:** 67,000

**Working Rtr:** (10076) Saturn of Appleton

Figure 28 - Redacted PII.

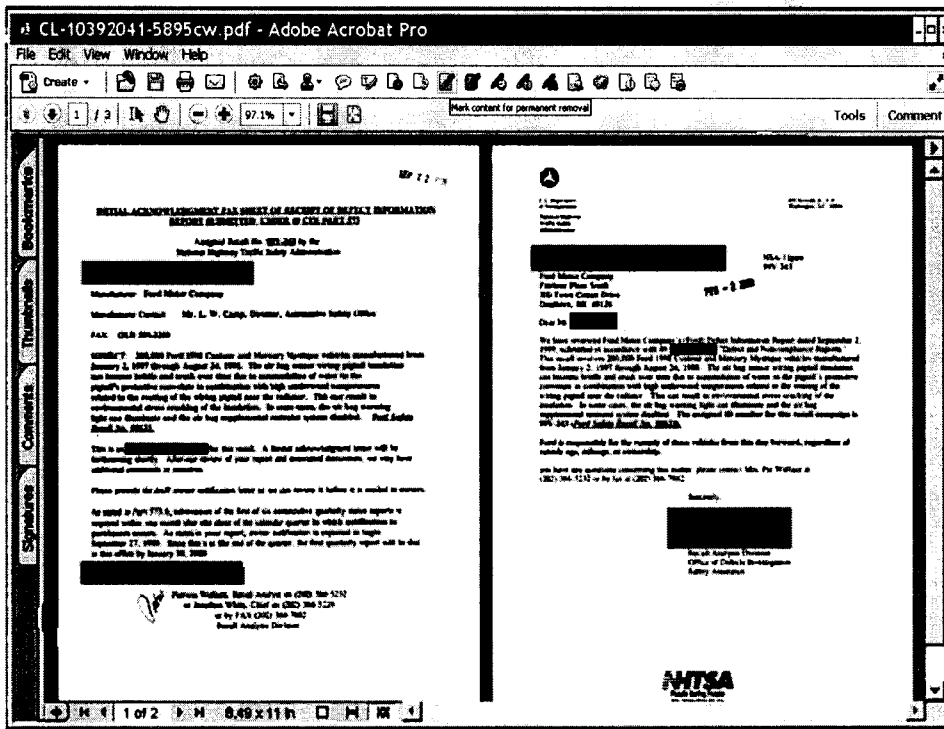


Figure 29 – Redacted PII.

**Note:** When redacting an IVOQ document only, if a VIN number is found in the complaint description in part or whole, confirm or copy the VIN to the VIN field in Artemis and remove it and its label "VIN" from the complaint description.

**POWER TRAIN:  
DRIVELINE**

3/31/2010 - WENTZVILLE, MO  
 MY ISSUES OCCURRED 5 YEARS AGO, IT WAS THE FIRST YEAR TOYOTA USED THE COMPUTERIZED ACCELERATION IN THEIR CARS. THIS INFORMATION IS IMPORTANT TO THE INVESTIGATION BEING CONDUCTED BY NASA. FEBRUARY 21, 2005 WE PURCHASED A BRAND NEW TOYOTA SOLORA BY JUNE WE SOLD IT. THE CAR FAILED TO ACCELERATE ON SEVERAL OCCASIONS BY NOT RESPONDING WHEN I PUSHED THE GAS PEDAL. I REALIZE THIS IS THE OPPOSITE END OF THE SPECTRUM, BUT TRUST THAT IT IS RELEVANT. PLEASE ENSURE NASA GETS THIS INFORMATION IT WILL GIVE THEM MORE TO WORK WITH. I AM WRITING YOU TODAY BECAUSE FOLLOWING A NEWS BROADCAST ABOUT TOYOTA MY CHILD ASKED ME IF I REMEMBERED OUR INCIDENT THAT ALMOST COST US OUR LIVES IN THAT CAR. I HAVE PLACED THIS INFORMATION IN YOUR HANDS TO DO THE RIGHT THING WITH. VIN# 4T1CA3EP183005 CASE NUMBERS ON FILE WITH TOYOTA 200504110025 - APRIL 11, 2005 200505090783 0MAY 9, 2005 200505120765 - MAY 12, 2005 THE ISSUES WERE FIRST HANDLED AT THE DEALERSHIP LEVEL WHERE THE VEHICLE WAS PURCHASED, BEFORE I REALIZED THERE WAS A SERIOUS SAFETY ISSUE WITH THE VEHICLE. IF YOU HAVE ANY QUESTION I CAN BE REACHED AT (636) 300-6346 MEMBER#

Source: NHTSA Website

Figure 30 – X’s used to redact PII.

VW File Number	Category	Vehicle Owner Name	Vehicle Owner Address	Vehicle Owner Phone	VIN	Make
90187858	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWAJ71K77MXXXXXX	Volkswagen
90198558	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWAL71K39MXXXXXX	Volkswagen
90176126	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWAL71K49MXXXXXX	Volkswagen
90180149	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWAL71K49MXXXXXX	Volkswagen
90177845	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWAB1K09MXXXXXX	Volkswagen
90181183	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWBA71K78MXXXXXX	Volkswagen
90190664	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWBJ71K28MXXXXXX	Volkswagen
90195104	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWBJ71K28MXXXXXX	Volkswagen
90180990	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K09MXXXXXX	Volkswagen
90190735	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K09MXXXXXX	Volkswagen
90190724	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K19MXXXXXX	Volkswagen
90185521	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K29MXXXXXX	Volkswagen
80323358	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWGL71K29MXXXXXX	Volkswagen
90181082	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K69MXXXXXX	Volkswagen
90155879	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K69MXXXXXX	Volkswagen
90189804	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K69MXXXXXX	Volkswagen
90180745	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K79MXXXXXX	Volkswagen
90180992	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K89MXXXXXX	Volkswagen
90178657	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K89MXXXXXX	Volkswagen
90190656	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K99MXXXXXX	Volkswagen
90189189	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWCL71K99MXXXXXX	Volkswagen
90100730	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWDJ71K08MXXXXXX	Volkswagen
90191594	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWDJ71K08MXXXXXX	Volkswagen
90189422	Consumer Complaint	REDACTED	REDACTED	REDACTED	3VWDJ71K78MXXXXXX	Volkswagen

Figure 31 - Example of PII redacted in a Pursuit document (an Excel spreadsheet).

**Note: For Pursuit documents only;** replace the Name, Address and Phone Numbers with the word "Redacted". Use 'XXXXXX' on the last 6 numbers of the VIN (Figure 31).

1. Pull the Pursuit Information spreadsheet from the CD (provided by Engineer).
2. Redact PII as indicated above.
3. Add Disclaimer (see Figure 3).
4. Create a password (to prevent any further changes to document) by; Save as --- Tools --- General Options --- Read Only --- type password (3 letter code) --- OK --- repeat password --- Save
5. Save redacted copy to the, previously created, desktop folder on hard drive (specifically for Pursuits).

6. Save a copy to the Pursuits QC folder on the DOT network. (Save an original copy to the QC folder also).
7. Create a Tracking Number (for Artemis) and upload to the Public Repository.
8. Return CD to Engineer.
9. If doc is too large (over 25mb) save redacted file to a CD, create a slip-sheet and pass to the Investigation Case Assistant to handle further.

**Note:** The 3 letter password is created by the Document Handler via a personal system. (Discuss with management).

Form Approved: O.M.B. No. 3127-0088

<b>DOT Auto Safety Hotline</b> <b>Vehicle Owner's Questionnaire</b> To Report Vehicle Safety Defects 1-888-DASH-2-DOT (1-888-327-4236) INTERNET: www.nhtsa.dot.gov/hotline		FOR AGENCY USE ONLY 100148	
		Date Received 15-JUN-2010	Repository <input type="checkbox"/> Reference No. 10336447
The information you provide will be used to identify potential safety-related defects. We may share your information with the applicable vehicle manufacturer during an investigation or recall in accordance with the routine uses described in the agency's Privacy Act notice. See 49 FR 53971 (Sep. 3, 2004).			
<b>OWNER INFORMATION (Type or Print)</b>			
Name CAROL STODDARD		Daytime Telephone Number 781-639-1934	
Address 57 MONUMENT AVENUE		E-mail Address NSBOST@ACL.COM	
City SWAMPSCOTT	State MA	Zip Code 01907	
		Evening Telephone Number 781-398-1444	
<b>VEHICLE INFORMATION</b>			
17 digit Vehicle Identification Number Located at bottom of windshield on driver's side 1HGCM66SX4AB07806		Make HONDA	Model Year 2004
Date Purchased	Dealer's Name and Telephone Number	Engine: No. Cylinders 6	Fuel Type:
Original Owner <input type="checkbox"/>	Dealer's City	State	Zip Code
Transmission Type <input type="checkbox"/> Antilock Brakes <input type="checkbox"/> Cruise Control	Powertrain	Multiple Failure: 1	Incident Date(s) 10-JUN-2010
<b>FAILED COMPONENT(S)/PART(S) INFORMATION</b>			
Vehicle Component Code: 103000 POWER TRAIN: AUTOMATIC TRANSMISSION		Failure Mileage 91000	Failure Speed 60
<b>ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A TIRE FAILURE</b>			
Tire Make	Tire Model (Name or Number)	Tire Size (Example P215/65R15)	
DOT No. (Example: DOTM19ABC036)	<input type="checkbox"/> Original Equipment <input type="checkbox"/> Prior Repair	Failure Location:	
Tire Component Code	Tire Failure Type:		
<b>ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A CHILD SEAT FAILURE</b>			
Make:	Date Manufactured:	Model No./Name:	
Seat Type:	Installation System:		
Child Seat Component Code:	Failed Part:		
<b>APPLICABLE INCIDENT INFORMATION</b> <i>(Please describe in detail the incident(s), failure(s), crash(es), and injury(ies).)</i>			
Crash <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Fire <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Number of Persons Injured	Number of Deaths
		Reported to Police N	
Narrative Description of Incident(s), Crash(es), and Injury(ies). Please describe (1) events leading up to the failure, (2) failure and its consequences, and (3) what was done to correct the failure; i.e., parts repaired or replaced (and if old part is available).			
WE WERE LUCKY THAT WE WERENT KILLED!! 2004 HONDA ACCORD EXL 6CY VIN# [REDACTED]. WE WERE TRAVELING ON ROUTE 95 NORTH OF BOSTON IN THE MIDDLE LANE AT AN APPROX. SPEED OF 60 MPH ON JUNE 10, 2010 AT APPROX. 6:15PM. I WENT TO PASS THE CAR IN FRONT OF US AND STARTED TO PULL INTO THE PASSING LANE ON THE LEFT. SUDDENLY, THE CAR JERKED VIOLENTLY AND SLOWED DOWN SUDDENLY. THE CAR IN BACK OF US ALMOST HIT US AND SWERVED INTO THE LANE ON THE RIGHT TO AVOID HITTING OUR CAR. THE OTHER DRIVER WAS ALMOST RUN OVER BY A SEMI TRUCK WHO JAMMED ON HIS BRAKES. I THOUGHT HE (THE TRUCK) WAS GOING TO JACK KNIFE. I SEE THAT THIS TRANSMISSION PROBLEM IS A RECALL ITEM FOR HONDA. THE HONDA DEALER (KELLEY HONDA IN LYNN, MASS.) SAYS THAT THEY WILL NOT HELP US FINANCIALLY TO REPLACE THE TRANSMISSION. THE CAR HAS 90,000 MILES AND IS IN GOOD SHAPE OTHERWISE. WE ARE VERY UPSET AT HONDA'S REACTION TO THIS SAFETY FAILURE AND WE FEEL STRONGLY THAT THE US GOV'T SHOULD STEP IN BEFORE PEOPLE ARE NEEDLESSLY KILLED IN CARS WITH THIS TRANSMISSION. WE ALSO NOTE ON THE INTERNET THAT THERE ARE TONS OF PEOPLE WITH THE SAME PROBLEM AND VERY DANGEROUS EXPERIENCES. PLEASE HELP AND GET THE WORD OUT!! [REDACTED] INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6). *TR			
Include, if available, Police/Fire Department Report, Photos, and Repair Invoice. <span style="float: right;">ATTACH ADDITIONAL SHEETS IF NECESSARY</span>			
The Privacy Act of 1974 (Public Law 93-579) This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your responses, or a statistical summary thereof, may be used in support of the agency's action.			

Figure 32 - Example of VIN# and PII redacted in an IVOQ document (in Artemis).

## IX. DEFINITIONS

### A

**Artemis** - Advanced Retrieval, Tire, Equipment and Motor Vehicle Information System, a Database and Image Repository system developed to enable FTE managers, writers, screeners, analysts, investigators and engineers to store and maintain data and meet reporting requirements based on the data.

**Artemis Image Repositories (Private and Public)** - The storehouse of ODI documents and records, the Repository is used by Administrative Support to: review Consumer Correspondence source documents, extrapolate requisite information and enter the information into the corresponding records in the Artemis Database. Perform Quality Control checks of Correspondence entered into the Artemis Database for grammatical, spelling, redaction of PII (Public) and data entry errors. The Private (Internal) Repository is used 'in house' by FTE and contractors; the Public (External) Repository is accessible via the Internet.

### C

**Confidential Material** -

**Congressional Letters** - One of the many types of documents which arrive by mail and come from members of Congress speaking on behalf of their constituents or requesting information regarding safety related defects. Congressional Letters require Top Priority Processing, as they MUST be responded to within 3-4 days after receipt.

**Consumer Letters** - Consumer Letters received in the mail and through the Internet contain requests for information, report defects and/or identify recall problems. Consumer Letters require Priority Handling, include, but are not limited to: Letters from Consumers, Freedom of Information Act (FOIA) Requests, Email Consumer Letters and Email Consumer Forms.

### D

**Data Entry** - Staff enter information on Complaints and Technical Service Bulletins into the Artemis Database, they also prepare Technical Service Bulletins for Scanning into the Artemis image repository.

**Disclaimer** -

### E

**Email Consumer Form** - Emailed to ODI through the Internet, identified by the ODI Manager's name printed on the top left corner of the email. Email Consumer forms are processed as Consumer Letters.

**Email Consumer Letter** - Emailed to ODI through the Internet, identified by being formatted like a memo, example: From: Consumer's email address, To: ODI Manager and Subject.



**F**

**File Name** - assigned by the person scanning the documents.

**FOIA** - Freedom of Information Act, for redaction, a single page is inserted that reads: THE ATTACHMENTS TO THIS DOCUMENT HAVE BEEN REMOVED TO PROTECT UNWARRANTED INVASION OF PERSONAL PRIVACY PURSUANT TO EXEMPTION 6 OF THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B) (6).

**FTE** – Full Time Employee (Federal)

**I**

**Internal Repository (Private)** - data storage and retrieval area in Artemis for internal use only

**Internet Vehicle Owner's Questionnaire – (IVOQ) Requests** – Complaints generated by Consumers who use the NHTSA website to report problems with their Vehicles, Tires, Equipment and/or Child Restraint Systems if applicable

**M**

**Mailed-In Vehicle Owner's Questionnaires – (MVOQ)** Questionnaires Consumers use to report problems with their Vehicles, Tires, Equipment and /or Child Restraint Systems include: Vehicle Owner's Questionnaires, Optical Marked Vehicle Owner's Questionnaires Child Safety Seat Questionnaires and Ohio Turnpike Crash Reports.

**O**

**ODI** - Office of Defects Investigation

**ODI Number** - An eight-digit number automatically assigned a document when entered into Artemis.

**Optical Marked Vehicle Owner's Questionnaire - Optical Marked VOQ-** A Questionnaire, distinguishable by 'penciled-in' responses, the Consumer uses to report problems with their Vehicles, Tires, Equipment and/or Child Restraint Systems.

**OVSC** - Office of Vehicle Safety Compliance (NHTSA)

**P**

**Petitions** -

**PII** – Personally Identifiable Information (Name, address, Social Security Number etc.)

**Police Report** - A Report taken by law enforcement officers regarding a vehicle accident or defect resulting in a traffic hazard. When applicable the Report can include information on the consumer, fatality, personal injury, property damage, weather conditions, primary causation factors and accident and fatality ratios.

**Public Repository (External)** – Artemis’s data storage and viewing available to the public.

**Pursuit** – An investigation operation regarding a vehicle defect that leads to a death or injury.

**Q**

**Quality Control** – checks for spelling, grammar, possible data entry mistakes and PII and Disclaimer statement on documents entered into Artemis by Data Entry Staff, Vehicle Safety Hotline staff and Public.

**R**

**Recall** - Correspondence between vehicle (parts) manufacturer and consumer where defects may require repair or replacement sponsored by the manufacturer and reported to NHTSA.

**Returned EVOQ Complaint** - an EVOQ Complaint ‘Returned’ by the Consumer which may contain additional (written) information about the Complaint and supporting documentation such as letters, invoices and/or pictures attached to it.

**Redaction marks** -

**S**

**Sanitized document** -

**Slip sheet** - a bar-coded form generated within Artemis that identifies correspondence logged into the Artemis Correspondence Module. The Slip Sheet is attached to the document and sent to the Scanning Station.

**T**

**Technical Service Bulletin (TSB)** - Manufacturers are mandated by law to provide NHTSA with the same Product Recall, Defective Product Component and Service Campaign information that they send to their Vehicle, Equipment, Tire and Child Restraint System Dealers. This information is distributed in a variety of formats; Emails, Letters, Newsletters, Pamphlets, Books or Computer Disks (CD). They are clearly marked with Vehicle, Equipment, Tire and/or Child Restraint System Manufacturer logos.

**V**

**Vehicle Safety Hotline** - public available phone line to enable consumers to call and place a complaint regarding a possible safety issue with their vehicle requiring NHTSA to respond or collect data for trend or manufacturer information

**VOQ - Vehicle Owners Questionnaire** received in the mail from the consumer the form is identical to an EVOQ Complaint or Returned EVOQ except for the fact that all the information given is written on the form by the consumer.

## X. REFERENCES

Other related SOPs available on the Enforcement Document Library/Contractor Resources/ site:  
<http://our.dot.gov/office/nhtsa.nvs/NVS-200/enforcelib/default.aspx>

- Scanning SOP
- Quality Control SOP
- Pursuit SOP

# CENTER FOR AUTO SAFETY

1825 CONNECTICUT AVENUE NW  
202-328-7700

SUITE 330

WASHINGTON DC 20009-5708  
www.autosafety.org

OFFICE OF CHIEF COUNSEL  
RECEIVED

2015 NOV 10 A 10:12

November 4, 2015

## VIA FAX AND FIRST CLASS MAIL

National Highway Traffic Safety Administration (NHTSA)  
Executive Secretariat  
1200 New Jersey Ave. SE  
West Building  
Washington, DC 20590

## FOIA REQUEST

Dear FOIA Officer:

The Center for Auto Safety ("CAS") files this request pursuant to the Freedom of Information Act ("FOIA"). CAS is a nationwide nonprofit consumer advocacy organization established in 1970 by Consumers Union and Ralph Nader. CAS works toward improved safety, environmental responsibility, and fair dealing in the automotive industry and the marketplace.

CAS seeks the following information:

**The entire document containing the attached table, "Information to redact or not redact according to the document type." The full document is likely a memorandum on NHTSA redaction policy issued by Chief Counsel or by the Office of Defects Investigation.**

CAS believes that the requested records are likely to be located within the Office of Defects Investigation, the Office of Chief Counsel, and/or the Office of the Administrator. These documents may include electronic as well as paper records. Also, pursuant to 5 U.S.C. § 552(a)(4)(A) and U.S. Department of Transportation regulations set forth at 49 C.F.R. § 7.44, CAS requests, and NHTSA should grant, a waiver and/or reduction of fees for processing this FOIA request, including search, review, and duplication charges, for the reasons given below.

49 C.F.R. § 7.44(a) and (c) provide that a fee is not to be charged for the first two hours of search time or the duplication of the first 100 pages, "unless the records are requested for commercial use." In addition, 49 C.F.R. § 7.44(d) states that review fees for determining whether the requested records are exempt from mandatory disclosure may not be charged when records are not requested for a commercial use. The above information request is of a very limited and highly specific nature, and CAS believes that

ES15-005819

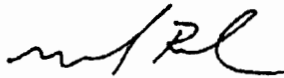
these records have no commercial value whatsoever. Even if the requested records had some potential commercial value, CAS has no commercial purpose or interest in requesting them. See Attachment A. Therefore, NHTSA should fully apply the subsection (a), (c) and (d) allowances to this request.

Should NHTSA deny the waiver of fees, CAS asks that the Agency to obtain authorization from CAS before delivery of any materials. If the agency refuses access to any of the requested records, please describe the materials it wishes to withhold and specify the statutory justifications for the refusal. Also, please state separately NHTSA's reasons for failing to invoke its discretionary powers to release the materials in the public interest.

If you have any questions about the scope of this request, or if you believe there are any ambiguities in the way CAS has framed its request, please let me know as soon as possible.

CAS looks forward to a response within twenty working days, as required under the FOIA, and will interpret any delay in response as a denial of this request. Thank you for your very prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'm/b' followed by a stylized flourish.

Michael Brooks  
Staff Attorney

Attachment(s): 2

# CENTER FOR AUTO SAFETY

1825 Connecticut Avenue, NW Suite 330 Washington, DC 20009-1160 (202) 328-7700

Attachment A

## MISSION STATEMENT

The Center for Auto Safety (CAS) is a nonprofit research and advocacy organization founded by Consumers Union and Ralph Nader in 1970 to provide consumers with a voice for auto safety and quality in Washington, D.C. and to assist owners of "lemon" vehicles to file complaints and obtain relief. Although CAS has a staff of less than a dozen people, its work is supported by approximately 20,000 members across the United States, and it is nationally recognized as a leader in the areas of automobile safety and consumer protection.

CAS vigorously supports economically feasible motor vehicle safety policies that will reduce the risk of crash-related deaths and injuries. CAS serves as an important counterweight before federal policymakers to the automobile industry, whose positions on these safety issues are dictated by the desire to maximize profits for shareholders rather than to strike the proper balance between safety and other vehicle features.

In fulfilling its mission, CAS is engaged in the following activities:

- X Researching defects in motor vehicles and monitoring defect investigations conducted by the National Highway Traffic Safety Administration (NHTSA) and other federal agencies;
- X Obtaining information on potential vehicle safety defects from consumers, alerting NHTSA to these problems, and requesting that NHTSA undertake investigations;
- X Responding with comments to agency rulemaking proposals and other initiatives that affect motor vehicle safety;
- X Supporting motor vehicle safety legislation before Congress, including testifying at public hearings and advocating with members of Congress and their staffs;
- X Monitoring enforcement of federal vehicle safety laws by NHTSA and other federal agencies;
- X Furnishing consumers with free information packets that detail the performance and safety problems of vehicles by make, model, and model year; and
- X Providing free information to consumers about state "lemon laws" and automobile manufacturers "secret warranties" (where the auto manufacturer has an internal policy to pay for repairs beyond the limits of the express warranty) to assist consumers with complaints against manufacturers or dealers.

A key pillar of CAS's mission is actively to disseminate the information that CAS gathers to the public so that consumers are better informed about motor vehicle safety issues. CAS regularly distributes a newsletter to its 20,000 members. CAS is also establishing a website that will provide information on a range of motor vehicle safety topics. In addition, because members of CAS's staff are recognized as leading experts on motor vehicle safety, CAS officials regularly appear on television and radio, and they are frequently quoted in the print media. CAS staff members also write op-ed pieces for national and local newspapers. Finally, CAS forms coalitions with some of the nation's leading individual and organizational advocates for motor vehicle safety, and CAS encourages these safety leaders to disseminate the information gathered and produced by CAS to their memberships and contacts. These other organizations, such as Public Citizen and its approximately 100,000 members, Consumers Union, and the Consumer Federation of America, routinely utilize information and analysis provided to them by CAS.

**Table 1. – Information to redact or not redact according to the document type**

Document Types	Information Redacted	Not Redacted
<p>Consumer Complaints/ Correspondence letters/Congressional letters/Petition letters/Newspaper excerpts/Other supporting documents</p>	<p>Names            Street addresses            Zip or postal codes            Social Security numbers            Dates of birth            Ages            Driver's license numbers            Family/friend names            Faces/injuries/deceased bodies in photos            Car tags or license plate numbers (private vehicles only)            Phone numbers – home, business, fax and mobile numbers            Signatures from the consumer, family, friends, or witnesses            Insurance claim numbers            Insurance policy numbers            Warranty/Invoice claim numbers            Junkyard/Insurance claim centers stock numbers (usually painted on vehicles)            Bank account numbers            Credit card numbers            Last 6 digits of the VIN            Foreign VIN last 6 digits            E-mail addresses            VIN barcode (part of barcode)            Citation numbers            Police accident report case number            Court reference numbers            Website address or URL</p>	<p>State            City            First 11 characters of VIN number            Car tags or license plates of commercial vehicles            Names and addresses of parties acting in their official capacity (e.g., lawyers, doctors, automobile dealers, automotive service businesses, police officers, EMT, coroners, nurses, government officials, judges etc.)</p>

<p>Death Certificates, Autopsy Reports or other information related to deceased individuals</p>	<p>Names  Street addresses  Zip or postal codes  Social Security numbers  Dates of birth  Ages  Driver's license numbers  Family/friend names  Faces/injuries/deceased bodies in photos  Car tags or license plate numbers (private vehicles only)  Phone numbers – home, business, fax and mobile numbers  Signatures from the consumer, family, friends, or witnesses  Insurance claim numbers  Insurance policy numbers  Last 6 digits of the VIN  Foreign VIN last 6 digits  E-mail addresses  VIN barcode (part of barcode)  Citation numbers  Police accident report case number  Any unique identifier for death certificates/autopsy reports (e.g. Report number)</p>	<p>State  City  First 11 characters of VIN number  Car tags or license plates of commercial vehicles  Names and addresses of parties acting in their official capacity (e.g., lawyers, doctors, automobile dealers, automotive service businesses, police officers, EMT, coroners, nurses, government officials, judges etc.)</p>
<p>Medical Records, such as, doctor reports and medical reports</p>	<p><i>Replace with disclaimer page (See page below)</i></p>	<p><i>Replace with disclaimer page (See page below)</i></p>



<p>Police Accident Reports</p>	<p>Names  Street addresses  Zip or postal codes  Social Security numbers  Dates of birth  Incident dates  Ages  Driver's license numbers  Family/friend names  Faces/injuries/deceased bodies in photos  Car tags or license plate numbers  (private vehicles only)  Phone numbers – home, business, fax and  mobile numbers  Signatures from the consumer, family,  friends, or witnesses  Insurance claim numbers  Insurance policy numbers  Bank account numbers  Credit card numbers  Last 6 digits of the VIN  Foreign VIN last 6 digits  E-mail addresses  VIN barcode (part of barcode)  Citation numbers  PAR case number  Mile markers  Street names (where the accident  occurred, in pictures/diagrams/narrative)</p>	<p>State  City  First 11 characters of  VIN number  Car tags or license  plates of commercial vehicles  Names and  addresses of parties acting in  their official capacity (e.g.,  lawyers, doctors, automobile  dealers, automotive  service businesses,  police officers, EMT,  coroners, nurses,  government officials,  judges etc.)</p>
<p>Work Orders/Repair  Invoices/Warranty  Information/Insurance claims</p>	<p>Names  Street addresses  Zip or postal codes  Social Security numbers  Dates of birth  Ages  Driver's license numbers  Family/friend names  Car tags or license plate numbers  (private vehicles only)  Customer phone numbers – home,  business, fax and mobile numbers  Signatures from the customer  Insurance claim numbers  Insurance policy numbers  Bank account numbers  Credit card numbers  Last 6 digits of the VIN  Foreign VIN last 6 digits  E-mail addresses  VIN barcode (part of barcode)</p>	<p>State  City  First 11 characters of  VIN number  Car tags or license  plates of commercial vehicles  Names and  addresses of parties acting in  their official capacity (e.g.,  lawyers, doctors, automobile  dealers, automotive  service businesses,  police officers, EMT,  coroners, nurses,  government officials,  judges etc.)</p>

<p>Lawsuit Documents (Depositions, complaints, other supporting documents etc.)</p>	<p>Names Street addresses Zip or postal codes Social Security numbers Dates of birth Ages Driver's license numbers Family/friend names Faces/injuries/deceased bodies in photos Car tags or license plate numbers (private vehicles only) Phone numbers – home, business, fax and mobile numbers Signatures from the consumer, family, friends, or witnesses Insurance claim numbers Insurance policy numbers Warranty/invoice claim numbers Junkyard/Insurance claim centers stock numbers (usually painted on vehicles) Bank account numbers Credit card numbers Last 6 digits of the VIN Foreign VIN last 6 digits E-mail addresses VIN barcode (part of barcode) Citation numbers Police accident report case number Accident incident date Mile markers Street names (where the accident occurred) PII in lawsuit caption if PII is of individuals not acting in official/commercial capacity Court reference number Witness PII: e.g. name, address, telephone, DOB, faces, signatures etc.</p>	<p>Lawyers involved in the lawsuit Names and addresses of commercial organizations Names and addresses of parties acting in their official capacity (e.g., lawyers, doctors, automobile dealers, automotive service businesses, police officers, EMT, coroners, nurses, government officials, judges etc.)</p>
<p>Petition Information found in pursuits (<u>i.e. DP investigation files</u>)</p>	<p>Petitioner's address (including city and State) Telephone number Zip or Postal Codes Social Security numbers Dates of Birth Age Driver's License numbers Family/Friend names Third-party names and witness information Street Addresses Faces/injuries/deceased bodies in photos Car tags or license plate numbers Phone numbers – home, business, fax and mobile numbers Signatures from the consumer, family, friends, or witnesses Insurance claim numbers Bank account numbers Credit card numbers Last 6 digits of the VIN E-mail addresses Foreign VIN last 6 digits VIN barcode (part of barcode)</p>	<p>Petitioner's Name(s) Names and addresses of parties acting in their official capacity (e.g., lawyers, doctors, automobile dealers, automotive service businesses, police officers, EMT, coroners, nurses, government officials, judges etc.)</p>