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Submitted Electronically via Regulations.gov

May 15, 2023

Otto G. Matheke III
Director, Office of Vehicle Safety Compliance
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: Inconsequential Noncompliance Petition - Proterial Cable
America, Inc. (formerly Hitachi Cable America Inc.) and
Harley Davidson Motor Company (FMVSS No. 106)
[Docket No. NHTSA-2022-0094-0001]**

Dear Mr. Matheke:

Proterial Cable America, Inc. is submitting this comment to supplement the information provided in its August 19, 2022 Petition for Determination of Inconsequential Noncompliance and November 10, 2022 Supplemental Petition for Determination of Inconsequential Noncompliance. The attached materials, which provide further support for Proterial's petition, have already been submitted to the National Highway Traffic Safety Administration and are being submitted as a comment to this docket for completeness.

Sincerely,



Sarah L. Wilson

cc: Claudia Covell, Office of Vehicle Safety Compliance
Manuel Maldonado, Office of Vehicle Safety Compliance
Dan Rabinovitz, Office of Chief Counsel

Attachments:

August 19, 2022 (Revised May 12, 2023) Exponent Technical Report in Support of Hitachi Cable America, Inc. Petition for Inconsequential Noncompliance – FMVSS 106, Brake Hoses

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November 10, 2022 Exponent Technical Report in Support of Hitachi Cable America, Inc. Amended Petition for Inconsequential Noncompliance – FMVSS 106, Brake Hoses

December 2, 2022 Exponent Addendum to Supplemental Technical Report in Support of Hitachi Cable America, Inc. Amended Petition for Inconsequential Noncompliance – FMVSS 106, Brake Hoses

Proterial Cable America, Inc.'s April 21, 2023 Second Supplemental Petition for Determination of Inconsequential Noncompliance (date corrected from April 21, 2022 to April 21, 2023)

April 21, 2023 Exponent Technical Report in Support of Proterial Cable America, Inc. Second Supplemental Petition for Inconsequential Noncompliance – FMVSS 106, Brake Hoses

May 15, 2023 Exponent Addendum to Technical Report in Support of Proterial Cable America, Inc. Second Supplemental Petition for Inconsequential Noncompliance—FMVSS 106, Brake Hoses