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Ford Motor Company

Technical Director -- File Reference No. 2012-260  
Financial Accounting Standards Board  
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**File Reference: Comments on Exposure Draft, Financial Instruments – Credit Losses (Subtopic 825-15)**

Ford Motor Company (“Ford”), a global automotive industry leader based in Dearborn, Michigan, manufactures or distributes automobiles across six continents. Ford Motor Credit Company LLC (“Ford Credit”), an indirect, 100% owned subsidiary of Ford, is one of the world’s largest automotive finance companies. We file consolidated financial statements with the SEC reflecting two business sectors, Automotive and Financial Services. Ford Credit also files financial statements as a separate SEC registrant.

We appreciate the opportunity to comment on the FASB’s Exposure Draft, “*Financial Instruments – Credit Losses*.” The IASB has recently issued an Exposure Draft, “*Financial Instruments: Expected Credit Losses*”, with a comment due date of July 5, 2013. As a global company that will need to comply with both proposed standards, we consider it important for us to compare and contrast the guidance of both proposals in order to provide meaningful feedback. Therefore, we respectfully request the FASB to consider extending the comment letter due date to be aligned with the IASB’s comment deadline.

We appreciate the FASB’s efforts to enhance the credit loss model and support your goal to address criticism stemming from the recent credit crisis. We also commend the FASB’s efforts to address our comments on the previous exposure draft. Importantly, we continue to urge the FASB and the IASB to work toward establishing a common credit loss model that is practical and cost-effective to implement.

We appreciate your consideration of our request.

Sincerely,



Susan M. Callahan  
Manager, Global Accounting Policies & Special Studies