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Ford Motor Company

Technical Director -- File Reference No. 2011-240  
Financial Accounting Standards Board  
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**File Reference: Comments on Exposure Draft, Deferral of the Effective Date for Amendments to the Presentation of Reclassifications of Items Out of Accumulated Other Comprehensive Income in Accounting Standards Update No. 2011-05**

We support the FASB's proposal to defer the requirement of ASU 2011-05 to present the reclassification of items out of accumulated other comprehensive income ("AOCI") in our primary financial statements. We believe that providing detailed information related to the recycling of AOCI in our primary financial statements will distract users from concentrating on key information related to operating results. When an amount is reclassified out of AOCI, the amount can be included in several different line items on both the income statement and and/or the balance sheet. We believe that the cost and effort to determine exactly when and where these adjustments are recycled through earnings will outweigh the perceived benefit to an investor. Therefore, we recommend that preparers be required to report only the amount of the adjustment reclassified out of AOCI. Furthermore, we recommend that the guidance provide an option to report this information either on the face of Statement of Comprehensive Income or the notes to the financial statements.

ASU 2011-05 is effective for both, fiscal years and interim reporting periods. However, the guidance in ASC 220-10-45-18 is not clear as to the level of detail required for interim financial statements. We encourage the Board to consider the costs and benefits related to presentation of the components of OCI and the level of detail necessary for interim financial reporting. We believe that summarized activity for each component of OCI, a total for income tax and the total amount attributed to non-controlling interests provides sufficient information for interim reporting.

In addition to our support for the proposed deferral, we believe that it is very important that the FASB and IASB agree on the conceptual purpose for other comprehensive income ("OCI"). We encourage the Boards to reach a consensus on the precise components of OCI (i.e., whether items such as defined benefit plan amendments should be included), and how these components should be released (i.e., whether items should be recycled through income or recorded directly to retained earnings).

Sincerely,

A handwritten signature in blue ink that reads "Susan Callahan".

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