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December 21, 2012

Ford Motor Company

Technical Director -- File Reference No. 2012-250 Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116 director@FASB.org

VIA EMAIL: director@FASB.org

File Reference: Comments on Exposure Draft, Balance Sheet (Topic 210): Clarifying the Scope of Disclosures about Offsetting Assets and Liabilities

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 Board's effort to clarify the intended scope of Accounting Standards Update 2011-11, Disclosures about Offsetting Assets and Liabilities ("the ASU") and address any unintended consequences of the recently issued guidance. We support the proposal to limit the scope of the disclosures required by the ASU to derivatives, repurchase agreements, reverse repurchase agreements, and securities borrowing and lending transactions that are either offset on the balance sheet or subject to an enforceable master netting arrangement or similar agreement.

We agree with the Board that the clarified scope will significantly reduce preparers' operational concerns. We are not aware of any other instruments that should be included in the proposed scope in order to assist in the reconciliations between U.S. GAAP and IFRS, nor do we foresee any significant operability or auditing concerns or constraints in implementing the revised scope of the disclosures based on the proposed ASU.

We appreciate your consideration of our comments.

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Sincerely,

Susan M. Callahan

Manager, Global Accounting Policies & Special Studies

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