Technical Director – File Reference No. 2014-220
Financial Accounting Standards Board
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VIA EMAIL: director@fasb.org


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 Simplification Initiative, which has been established with the objective of identifying, evaluating, and improving areas of generally accepted accounting principles (GAAP) for which cost and complexity can be reduced while maintaining or improving the usefulness of the information provided to users of the financial statements. We support the proposed update issued as part of the initiative to eliminate from GAAP the concept of extraordinary items. We agree that eliminating the extraordinary classification would simplify income statement presentation.

We also agree with the Board that the proposed Update will not result in a loss of information because the presentation and disclosure guidance for items that are unusual in nature or that occur infrequently would be retained.

We strongly support the continued efforts of the Board in their work related to the Simplification Initiative. We believe it is critical that the Board continues to assess qualitative characteristics of financial reporting and evaluate cost versus benefit to users of financial statements.

We appreciate the Board’s consideration of our comments.

Sincerely,

Susan M. Callahan
Director, Americas Accounting and Global Accounting Policy