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February 1, 2012

Ford Motor Company

Technical Director -- File Reference No. EITF-11A
Financial Accounting Standards Board
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VIA EMAIL: director@FASB.org

File Reference: Comments on Exposure Draft, Parent's Accounting for the Cumulative Translation Adjustment upon the Sale or Transfer of a Group of Assets That is a Nonprofit Activity or a Business within a Consolidated Entity in Proposed Accounting Standards Update File Reference No. EITF-11A

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") is an indirect, wholly owned subsidiary of Ford that provides dealer and customer financing to support the sale of Ford Motor Company products.

We appreciate the opportunity to comment on the above referenced Exposure Draft. We agree with the proposal to require an entity to release any related cumulative translation adjustment into earnings when it ceases to have a controlling financial interest in a group of assets that is a nonprofit activity or a business within a consolidated foreign entity, consistent with the guidance in Subtopic 830-30-40. We also support the proposals to recognize the related amount of accumulated gain/loss on any net investment hedges attributable to that nonprofit activity or business in earnings, to apply the proposed guidance prospectively, and to allow for early adoption.

We also encourage the Board, as part of this or a separate project, to provide clarity with respect to the release of the disproportionate tax effect related to items that gave rise to other comprehensive income. ASC 740 is silent as to the disposition of the tax effect lodged in accumulated other comprehensive income. Just as there is diversity in practice related to the release of cumulative translation adjustment upon the sale or transfer of assets, there is diversity in practice with the treatment of the tax effect in accumulated other comprehensive income. Your attention to this matter will increase consistency in practice and will improve comparability of financial statements.

Furthermore, we strongly encourage and support the continuing efforts of the FASB and IASB in their work toward establishing a single set of high-quality global accounting standards.

We appreciate the Board's consideration of our comments.

Sincerely,

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

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