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September 30, 2014

Ford Motor Company

Technical Director -- File Reference No. 2014-210
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

VIA EMAIL: director@FASB.org

File Reference: Comments on Exposure Draft, Inventory (Topic 330): Simplifying the Measurement of Inventory

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 measure inventory at the lower of cost and net realizable value. We agree the proposed accounting would increase the consistency of measuring inventory among entities and reduce complexity because the current inventory measurement guidance involves estimating replacement cost, net realizable value, and net realizable value less an approximately normal profit margin. We also support the effort to closely align the measurement of inventory between U.S. GAAP and IFRS.

We strongly support the continued effort 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 views.

Sincerely,

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

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