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January 30, 2015

Ford Motor Company

Technical Director -- File Reference No. EITF-14B
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, Fair Value Measurement (Topic 820): Disclosures for Investments in Certain Entities That Calculate Net Asset Value per Share (or Its Equivalent)

Ford Motor Company ("Ford"), a global automotive industry leader based in Dearborn, Michigan, manufactures or distributes automobiles across six continents. Our defined benefit plans include investments for which fair values are measured at net asset value.

We agree with the proposed update to eliminate diversity in practice by removing the requirement to categorize within the fair value hierarchy investments for which fair values are measured at net asset value using the practical expedient. By removing these investments from the fair value hierarchy, all investments in the hierarchy would be classified using a consistent approach.

In order to reduce complexity, improve consistency and comparability in the application of fair value disclosures, we would appreciate the Board's effort in ensuring consistent requirements for fair value disclosures for both Topic 820 - Fair Value Measurement and Topic 715 - Compensation – Retirement Benefits. For example, the guidance under Topic 715 refers to a paragraph under Topic 820 that presently excludes ASC 820-10-35-54B, the paragraph being amended by the proposed guidance. We recommend that the Board provides a clear reference to this draft amendment for benefit plan fair value measures.

We strongly support the Board's continued effort to reduce complexity and diversity in practice. We believe it is important 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