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April 25, 2016

**Ford Motor Company**

VIA EMAIL: [director@FASB.org](mailto:director@FASB.org)

**File Reference 2016-210: Comments on Exposure Draft, Compensation—Retirement Benefits—Defined Benefit Plans—General (Subtopic 715-20): Changes to the Disclosure Requirements for Defined Benefit Plans**

Ford Motor Company ("Ford"), a global automotive industry leader based in Dearborn, Michigan, manufactures or distributes automobiles across six continents. We appreciate the Board's work on the disclosure framework project and its objective of improving the effectiveness of disclosures in the notes to financial statements by focusing on information that is most important to users of the financial statements.

We support the proposal to remove the disclosure requirements relating to the accumulated benefit obligation and the amounts in accumulated other comprehensive income expected to be recognized in the income statement over the next fiscal year. We agree that the information is not decision-useful.

We support the proposed additional requirements, with the exception of adding quantitative and qualitative disclosures from Topic 820 *Fair Value Measurement* for assets measured at net asset value using a practical expedient. We believe the additional workload and costs associated with the proposed added disclosures do not justify the benefit; the proposal would impose a time constraint on our asset managers to obtain information earlier than it is presently available. In addition, the detailed asset information is available as part of the benefit plan's financial statements which are filed later in the year. Furthermore, this information would be of little value to most Ford investors, adding disclosures to an already complicated and lengthy footnote. The proposed requirements are appropriate in benefit plan financial statements, but not in an entity's financial statements, as the assets belong to the plan and not to the entity.

We applaud the Board's efforts to improve the effectiveness of financial statement disclosures and appreciate the Board's consideration of our views.

Sincerely,

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

Susan M. Callahan  
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