Peter J. Daniel

Senior Vice President
& Controller

February 27, 2007

Nancy M. Morris
Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-9303

RE: File Number S7-24-06, Management's Report On Internal Control Over Financial Reporting

Ford Motor Company is pleased to respond to the above referenced release on the Securities and Exchange Commission's ("SEC") proposed interpretive guidance for management regarding its evaluation of internal control over financial reporting. We believe that the SEC's proposal to allow management greater flexibility to design an evaluation process that provides reasonable assurance for its assessment of the effectiveness of its internal control over financial reporting will improve the efficiency of the compliance program. In particular, we support the SEC allowing management to: 1) focus more on applying a top-down, risk-based approach to identify controls to assess, and 2) utilize a broader range of methodologies to obtain evidence of the effectiveness on those controls.

In applying the principle of a top-down, risk-based approach, the release would allow greater reliance to be placed on entity-level controls. While the release identifies certain entity-level controls that likely would not prevent or detect a material misstatement on a timely basis, it does not identify entity-level controls that likely would prevent or detect a material misstatement. The release also does not provide guidance on what are the acceptable characteristics or elements of effective entity-level controls. This could result in a lack of consistency among companies in utilizing such controls in their testing program. We recommend that the SEC provide additional guidance on the specific characteristics, as well as, examples of effective entity-level controls.

The release identifies various types of evidential matter that may be required to support management's assessment of the effectiveness of internal controls. It does not specify, however, what evidential matter must be maintained and how it should be maintained. We believe that to ensure consistency among companies, the SEC should provide additional guidance on both the type and the manner in which evidence should be maintained. The Public Company Accounting Oversight Board Audit Standard No. 3 requires that the auditor retain audit documentation for seven years. We believe the SEC should provide guidance on the time required for management to retain evidence supporting its assessment.

The release does not address a requirement to evaluate the significance of control deficiencies against interim, quarterly results to determine if a material weakness exists. The present practice, based on PCAOB guidance, is to evaluate the significance of control deficiencies against both interim and annual results. We recommend that the SEC and the PCAOB be aligned on this matter and not require that control deficiencies be evaluated against interim, quarterly results. This would better align the application of materiality of internal controls with that of the audit of the financial statements.

We appreciate the opportunity to provide comments on this matter and should you have any questions, please feel free to contact me by telephone at 313-845-7938.

Best Regards,

/s/

Peter J. Daniel
Senior Vice President
& Controller