



Ford Motor Credit Company

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December 20, 2004

Mr Fabrice Demarigny
Secretary General
Committee of European Securities Regulators
11-13 Avenue de Friedland
75008 Paris
France

Dear Sir

Re: CESR consultation on the concepts to be used by it to measure equivalence between third countries' GAAP and IAS/IFRS (ref: CESR/04-509)

We are writing in response to CESR's request for reactions to its October 2004 concept paper on equivalence of certain third country GAAP and on description of certain third countries' mechanisms of enforcement of financial information. We welcome the opportunity to contribute further to the discussion and congratulate CESR on its open and transparent approach to consultation and its willingness to listen to the views of all interested parties and market practitioners. As stated in our response to CESR's earlier (July 2004) consultation on the equivalence concept issue, the matters under discussion impact significantly on our business.

This letter is written on behalf of ourselves and our subsidiaries, Ford Motor Credit Company, Ford Credit Canada Limited, Ford Credit Australia Limited and PRIMUS Financial Services, Inc. We are the world's second largest producer of cars and trucks combined. Ford Credit is one of the leading automotive finance companies in the world providing vehicle and dealer financing in 36 countries to more than 10 million customers and more than 12,500 automotive dealers. We are issuers in the global debt markets and are especially active in the European debt markets. Collectively, we presently have debt outstanding totaling approximately \$90 billion listed on exchanges within the European Union. Moreover, together we issued approximately \$13 billion and \$17 billion of corporate securities in 2003 and 2002, respectively, which were listed on European exchanges. These securities include asset-backed issuances by special purpose entities that have an interest in assets originated by us. We believe that we were a major contributor to the development of the corporate bond market in Europe.

In the light of our comments to CESR's July 2004 consultation on concepts, Ford warmly welcomes the basis upon which CESR will approach the analysis of the equivalence of

certain third country GAAP and EU-endorsed IAS/IFRS. We are encouraged that CESR shares our view that for the purposes of this exercise equivalent should not be defined as meaning "identical". We strongly support CESR's view that third country GAAP, including US GAAP, can be declared equivalent to IAS/IFRS when financial statements prepared under such third country GAAP enable investors to take at least similar decisions in terms of whether to invest or divest, as if they were provided with financial statements prepared on the basis of IAS/IFRS. We remain of the view that to the extent that the analysis of the differences between a third country GAAP and IAS/IFRS is required, the determination of equivalency of the accounting standards should be based on the materiality of the differences, rather than the fact that any such differences exist. In this regard, we are encouraged by CESR's acknowledgement (on page 9 of the consultation document) that some differences between a third country's GAAP and IAS/IFRS would not give rise to differing investment decisions.

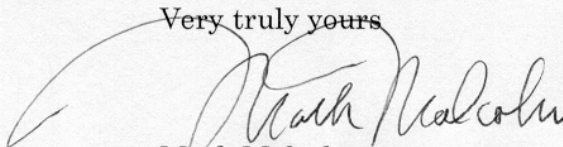
We continue to believe firmly that US GAAP and IAS/IFRS provide investors with equivalent disclosure of relevant and reliable information sufficient to make an informed investment decision and comparable standards for corporate governance, audit review and regulatory review and with the same level of protection, and therefore meets the objectives of the Prospectus Directive and the future Transparency Obligations Directive.

European and other investors in the European markets, particularly institutional and other professional investors, have a good knowledge of third country GAAP, especially US GAAP, and are experienced in understanding, assessing and comparing financial statements presented in US GAAP. Hence we believe it would be inappropriate to reduce choice for investors in the market by denying unnecessarily issuers the opportunity to continue to use a third country GAAP with which investors are very familiar.

Finally, we would like to underline the importance of certainty for investors and issuers alike and the need for minimum disruption to the European and global capital markets. We therefore encourage CESR to continue to pursue its work in accordance with the timetable envisaged by the Commission for the delivery of its advice (ie June 2005).

We look forward to participating further in the consultation process. If you have any questions on our submission please contact Carol V. Rogoff at crogoff@ford.com or telephone 011-44-1277-692002.

Very truly yours

A handwritten signature in dark ink, appearing to read 'Mark Malcolm', is written over a large, light-colored circular mark or stamp.

Mark Malcolm
Executive Vice President and Controller
Corporate Finance
Ford Motor Credit Company

cc: Carol Rogoff