



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-3010

January 2, 2008

Peter J. Sherry, Jr.
Secretary
Office of the Secretary
Ford Motor Company
One American Road
Room 1134 WHQ
Dearborn, MI 48126

Re: Ford Motor Company
Incoming letter dated December 21, 2007

Dear Mr. Sherry:

This is in response to your letter dated December 21, 2007 concerning the shareholder proposal submitted to Ford by Jane Van Driessche. We also received a letter from the proponent on December 31, 2007. Our response is attached to the enclosed photocopy of your correspondence. By doing this, we avoid having to recite or summarize the facts set forth in the correspondence. Copies of all of the correspondence also will be provided to the proponent.

In connection with this matter, your attention is directed to the enclosure, which sets forth a brief discussion of the Division's informal procedures regarding shareholder proposals.

Sincerely,

Jonathan A. Ingram
Deputy Chief Counsel

Enclosures

cc: Jane Van Driessche

*** FISMA & OMB Memorandum M-07-16 ***

CFOCC-00033119

January 2, 2008

Response of the Office of Chief Counsel
Division of Corporation Finance

Re: Ford Motor Company
Incoming letter dated December 21, 2007

The proposal relates to the location of Ford's annual meetings.

There appears to be some basis for your view that Ford may exclude the proposal under rule 14a-8(i)(7), as relating to Ford's ordinary business operations (i.e., the location of Ford's annual meetings). Accordingly, we will not recommend enforcement action to the Commission if Ford omits the proposal from its proxy materials in reliance on rule 14a-8(i)(7).

Sincerely,

Greg Belliston
Special Counsel



RECEIVED

2007 DEC 26 PM 6:05

OFFICE OF CHIEF COUNSEL
CORPORATION FINANCE

One American Road
Room 1134 WHQ
Dearborn, Michigan 48126

Office of the Secretary
Peter J. Sherry, Jr.
Secretary
313/323-2130
313/248-8713 (Fax)
psherry@ford.com

December 21, 2007

Securities and Exchange Commission
Division of Corporation Finance
Office of the Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

Re: Omission of Shareholder Proposal Submitted by Ms. Jane Van Driessche

Ladies and Gentlemen:

Pursuant to Rule 14a-8(j) promulgated under the Securities Exchange Act of 1934, as amended (the "Act"), Ford Motor Company ("Ford" or the "Company") respectfully requests the concurrence of the staff of the Division of Corporation Finance (the "Staff") of the Securities and Exchange Commission (the "Commission") that it will not recommend any enforcement action to the Commission if the shareholder proposal described below is omitted from Ford's proxy statement and form of proxy for the Company's 2008 Annual Meeting of Shareholders (the "Proxy Materials"). The Company's Annual Meeting of Shareholders is scheduled for May 8, 2008.

Ms. Jane Van Driessche (the "Proponent") has submitted for inclusion in the 2008 Proxy Materials a proposal that would require the Company to hold annual meetings in the Dearborn, Michigan area (see Exhibit 1; the "Proposal"). The Company proposes to omit the Proposal from its 2008 Proxy Materials for the following reason:

- The Proposal is excludable under Rule 14a-8(i)(7) because it deals with matters relating to the Company's ordinary business operations.

The Proposal Deals with Matters Relating to the Company's Ordinary Business Operations

Rule 14a-8(i)(7) provides that a shareholder proposal may be excluded from a company's proxy materials "if the proposal deals with a matter relating to the company's ordinary business operations." Ford believes that the location of its annual meeting clearly relates to the ordinary business operations and that it may properly exclude the Proposal from its Proxy Materials under Rule 14a-8(i)(7).

The Staff has consistently allowed exclusion of proposals dealing with setting the date, location, and matters concerning the conduct of shareholder meetings as dealing with

ordinary business matters. See *The Gillette Company* (February 4, 2004) (exclusion allowed where proposal required the site of annual meetings be fixed in Massachusetts); *Verizon Communications, Inc.*, (December 16, 2002) (exclusion allowed where proposal required that annual meetings be held at least every other year in New York City); *Verizon Communications, Inc.*, (February 25, 2002) (exclusion allowed where proposal recommended that the board limit sites of future annual meetings to regions where rate payers live); *The Gillette Company* (February 22, 2005) (exclusion allowed where proposal requested annual meeting be two to three hours in length and that food be served); and *Bank of America Corporation* (December 14, 2006) (exclusion allowed where proposal requested that the annual meeting be held on a Friday, Saturday, or Monday). See also, *Raytheon Company* (January 19, 2006) and *Bank of America Corporation* (January 10, 2003).

Determining the location of the annual meeting requires an evaluation of many factors, including the feasibility of attendance by management and directors, the management, staff and financial resources necessary to support the meeting at a location, the availability and cost of the facilities, and the accessibility of the location to shareholders. The Company's management has a unique and intimate knowledge of the Company's business, and, thus, can make an informed decision as to the appropriate location for the Company's annual meeting of shareholders. It is impractical for the Company's shareholders to make this decision as they do not, as a group, have the same knowledge of the Company with respect to these factors. Moreover, to fix a specific location for all future annual meetings would limit the discretion of the Board of Directors and management to hold meetings in a place other than that specified in the Proposal. Such an advance determination would eliminate the flexibility needed to fix the location of shareholder meetings based upon particular circumstances in a given year.

The Proposal seeks to establish the location of shareholder meetings. Matters relating to the conduct of shareholder meetings, including the location, have routinely been found to relate to matters of ordinary business, and clearly do not raise any significant policy concerns. Based on the foregoing and consistent with the precedent cited above, the Company respectfully requests the concurrence of the Staff in exclusion of the Proposal pursuant to Rule 14a-8(i)(7).

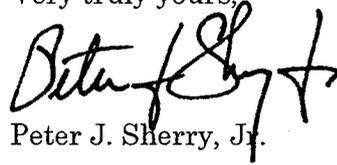
Conclusion

For the foregoing reasons, it is respectfully submitted that the Proposal may be excluded from Ford's 2008 Proxy Materials. Your confirmation that the Staff will not recommend enforcement action if the Proposal is omitted from the 2008 Proxy Materials is respectfully requested.

In accordance with Rule 14a-8(j), the Proponent is being informed of the Company's intention to omit the Proposal from its 2008 Proxy Materials by sending her a copy of this letter and its exhibit. Seven copies of this letter are enclosed. Please acknowledge receipt by stamping and returning one copy in the enclosed self-addressed stamped envelop.

If you have any questions, require further information, or wish to discuss this matter, please call Jerome Zaremba (313-337-3913) of my office or me (313-323-2130).

Very truly yours,

A handwritten signature in black ink, appearing to read "Peter J. Sherry, Jr.", written in a cursive style.

Peter J. Sherry, Jr.

Enclosure

Exhibits

cc: Ms. Jane Van Driessche (via Federal Express)

Share holder proposal
From Jane Van Driessche
subject further sites of Annual Meetings

Proposal;

Further sites of the Ford Motor Company will be held
in the area of Dearborn Michigan for their Annual Meetings

Rationale;

(R) The Ford Motor Company headquarters are located
in Dearborn Michigan, it would at least give the impression
that the company is trying to save the Fucks that it cost
to have the meeting else where over the area of Dearborn.

Jane Van Driessche
Jane Van Driessche

*** FISMA & OMB Memorandum M-07-16 ***

OFFICE OF THE SECRETARY
PETER J. SHERRY JR.

7 OCT 26 P3:11



HILLIARD LYONS

55 Hamblin Avenue | Battle Creek, MI 49017
(269) 660-9400 | (800) 276-4254 | fax (269) 660-9494

July 11, 2007

To Whom It May Concern:

Regarding: Orlen Vandriessche & Jane Vandriessche

Hilliard Lyons holds in their joint account 426.468 shares of Ford Motor common stock.

Sincerely,

HILLIARD LYONS

Lyn F. Liebum
Financial Consultant

The information in this correspondence is derived from sources we believe to be reliable but we cannot guarantee their accuracy. For specific information about your account and any activity therein, your Hilliard Lyons customer monthly statement is the official document upon which you may rely. Past performances are no guarantee of future results.

*We do plan on any sale of these shares
prior to the annual meeting*

Orlen Vandriessche



Office of the General Counsel
Phone: 313/3373913
Fax: 313/248-1988
E-Mail: jzaremb1@ford.com

Ford Motor Company
One American Road
Room 1037-A3 WHQ
Dearborn, Michigan 48126

October 29, 2007

Ms. Jane Van Driessche

*** FISMA & OMB Memorandum M-07-16 ***

Subject: Shareholder Proposal for 2008 Annual Meeting

Dear Ms. Van Driessche:

Ford Motor Company ("Ford" or the "Company") hereby acknowledges the shareholder proposal contained in your letter dated October 22, 2007. You request that the proposal relating to the Company holding future annual meetings in the Dearborn, Michigan area (the "Proposal") be included in the Company's 2008 proxy materials.

Eligibility requirements regarding stockholder proposals are set forth in Rule 14a-8 of the rules of the United States Securities and Exchange Commission (the "SEC"). (A copy of Rule 14a-8 is enclosed.) This rule provides that in order to be eligible to submit a proposal, a shareholder must have continuously held at least \$2,000 in market value, or 1%, of the Company's securities entitled to be voted at the annual meeting for at least one year by the date that the shareholder submitted the proposal. In the event the shareholder is not a registered holder, Rule 14a-8(b)(2) provides that proof of eligibility should be submitted at the time the proposal is submitted. Neither the Company nor its transfer agent was able to confirm that you satisfy the eligibility requirements based on the information that was furnished to the Company.

Under Rule 14a-8(b)(2) a shareholder may satisfy this requirement by either (i) submitting to the Company a written statement from the "record" holder of the shareholder's securities (usually a broker or bank) verifying that, at the time of submission, the shareholder continuously held the securities at least one year, or (ii) if the shareholder has filed a Schedule 13D, Schedule 13G, Form 3, Form 4 and/or Form 5, or amendments to those documents or updated forms, reflecting the shareholder's ownership of the shares as of or before the date on which the one-year period begins. If the shareholder has filed one of these documents, it may demonstrate its eligibility by submitting to the Company a copy of the schedule or form, and any subsequent amendments, and a written statement that the shareholder continuously held the required number of shares for the one-year period as of the date of the statement.

While the letter from Hilliard Lyons states that you currently own Ford stock, it does not state that you have continuously owned Ford stock for one year from the date you submitted the Proposal as required by Rule 14a-8(b)(2)(i). Furthermore, the SEC has

specifically stated that copies of account statements do not constitute sufficient evidence of continuous share ownership because a person can buy and sell shares within the one year period.

Additionally, please clarify your handwritten note on the copy of the Hilliard Lyons statement. Did you intend to write that "We do not plan on any sale of these shares prior to the annual meeting" (please see enclosed copy where the word "not" is missing)? Rule 14a-8(b)(2)(i) requires that you hold the shares through the date of the annual meeting.

We request that you submit a revised letter from Hilliard Lyons stating that you have beneficially owned at least \$2,000 worth of Ford stock for at least one year from the date of your submission and that you clarify your intention to hold Ford stock through the date of the 2008 Annual Meeting. We request that you submit this documentation within 14 days of your receipt of this letter.

If you cannot submit the requested documentation, we request that you withdraw the Proposal so that we can avoid submitting a No-Action Letter with the SEC to have the Proposal excluded. If you do not furnish the Company with such evidence and do not withdraw the proposal within the 14-day period, we will file a No-Action Letter with the SEC to have the proposal excluded from the Company's proxy materials. Furthermore, we reserve the right to file a No-Action Letter with the SEC should other substantive grounds for exclusion exist. We will notify you in accordance with SEC rules if we file such a request.

If you would like to discuss the SEC rules regarding stockholder proposals or anything else relating to the Proposal, please contact me at (313) 337-3913. Thank you for your interest in the Company.

Very truly yours,


Jerome R. Zaremba
Counsel

Encl.

cc: Peter J. Sherry, Jr.



55 Hamblin Avenue | Battle Creek, MI 49017
 (269) 660-9400 | (800) 276-4254 | fax (269) 660-9494

November 1, 2007

Orlen VanDriessche

*** FISMA & OMB Memorandum M-07-16 ***

Dear Orlen,

The following are the purchase dates and cost information on the Ford Motor Company you hold in your joint account:

Quantity	Name	Open Date	Unit Cost	Cost Amount
400	FORD MOTOR COMPANY NEW	08/03/2001	25.204	\$10,081.60
3.984	FORD MOTOR COMPANY NEW	06/01/2005	10.0402	\$40.00
4.052	FORD MOTOR COMPANY NEW	09/01/2005	9.9704	\$40.40
4.951	FORD MOTOR COMPANY NEW	12/01/2005	8.2408	\$40.80
5.163	FORD MOTOR COMPANY NEW	03/01/2006	7.9992	\$41.30
5.8	FORD MOTOR COMPANY NEW	06/01/2006	7.2103	\$41.82
2.518	FORD MOTOR COMPANY NEW	09/01/2006	8.4194	\$21.20
Total Cost				\$10,307.12

Please call with any questions.

Sincerely,

HILLIARD LYONS

Seanna M. Sullivan
 Client Service Representative

The information in this correspondence is derived from sources we believe to be reliable but we cannot guarantee their accuracy. For specific information about your account and any activity therein, your Hilliard Lyons customer monthly statement is the official document upon which you may rely. Past performances are no guarantee of future results.

We Orlen & Jane Van Driessche will not be selling any of our 426,468 shares before the 2008 annual Meeting.



HILLIARD LYONS

55 Hamblin Avenue | Battle Creek, MI 49017
(269) 660-9400 | (800) 276-4254 | fax (269) 660-9494

July 11, 2007

To Whom It May Concern:

Regarding: Orlen Vandriessche & Jane Vandriessche

Hilliard Lyons holds in their joint account 426.468 shares of Ford Motor common stock.

Sincerely,

HILLIARD LYONS

Lyn F. Liebum

Financial Consultant

The information in this correspondence is derived from sources we believe to be reliable but we cannot guarantee their accuracy. For specific information about your account and any activity therein, your Hilliard Lyons customer monthly statement is the official document upon which you may rely. Past performances are no guarantee of future results.

We do NOT plan on any sale of these shares prior to the annual meeting
Orlen Vandriessche



Office of the General Counsel
Phone: 313/3373913
Fax: 313/248-1988
E-Mail: jzaremb1@ford.com

Ford Motor Company
One American Road
Room 1037-A3 WHQ
Dearborn, Michigan 48126

November 6, 2007

Ms. Jane Van Driessche

*** FISMA & OMB Memorandum M-07-16 ***

Subject: Shareholder Proposal for 2008 Annual Meeting

Dear Ms. Van Driessche:

Ford Motor Company ("Ford" or the "Company") hereby acknowledges receipt of evidence of eligible share ownership of Ford common stock relating to the shareholder proposal contained in your letter dated October 22, 2007 (the "Proposal"). Thank you for your prompt attention to this matter and for clarifying your intent to hold these shares through the 2008 Annual Meeting date. Please note that Ford reserves the right to file a No-Action Letter with the SEC should substantive grounds exist for exclusion of the Proposal. We will notify you in accordance with SEC rules if we file such a request.

Thank you for your continued interest in the Company.

Very truly yours,

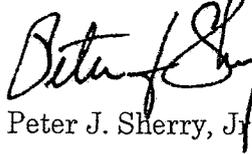
A handwritten signature in cursive script, appearing to read "Jerome F. Zaremba".

Jerome F. Zaremba
Counsel

cc: Peter J. Sherry, Jr.

RECEIVED

Very truly yours,


Peter J. Sherry, Jr.

2007 DEC 31 PM 3:57

OFFICE OF CHIEF COUNSEL
CORPORATION FINANCE

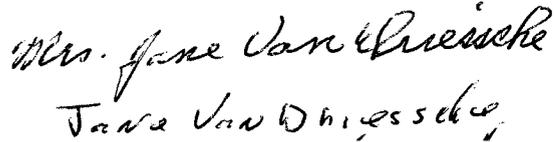
Enclosure

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cc: Ms. Jane Van Driessche (via Federal Express)

I do not agree that the proposal interferes with the every day business of the Ford Motor Co. and the proposal should be allowed as wrote.

I will not agree to remove the proposal, if there is a legal opinion that it can not be presented there may be nothing I can do to challenge the opinion.


Jane Van Driessche

*** FISMA & OMB Memorandum M-07-16 ***



Office of the Secretary
Peter J. Sherry, Jr.
Secretary
313/323-2130
313/248-8713 (Fax)
psherry@ford.com

One American Road
Room 1134 WHQ
Dearborn, Michigan 48126

December 21, 2007

Securities and Exchange Commission
Division of Corporation Finance
Office of the Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

Re: Omission of Shareholder Proposal Submitted by Ms. Jane Van Driessche

Ladies and Gentlemen:

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Conclusion

For the foregoing reasons, it is respectfully submitted that the Proposal may be excluded from Ford's 2008 Proxy Materials. Your confirmation that the Staff will not recommend enforcement action if the Proposal is omitted from the 2008 Proxy Materials is respectfully requested.

In accordance with Rule 14a-8(j), the Proponent is being informed of the Company's intention to omit the Proposal from its 2008 Proxy Materials by sending her a copy of this letter and its exhibit. Seven copies of this letter are enclosed. Please acknowledge receipt by stamping and returning one copy in the enclosed self-addressed stamped envelop.

If you have any questions, require further information, or wish to discuss this matter, please call Jerome Zaremba (313-337-3913) of my office or me (313-323-2130).