



January 16, 2008

Mr. Russell G. Golden
Director of Technical Application and Implementation Activities
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Re: Proposed FSP FAS 142-f: "Determination of the Useful Life of Intangible Assets"

Dear Mr. Golden:

The Walt Disney Company (TWDC) is pleased to have the opportunity to comment on the proposed FASB Staff Position 142-f, "Determination of the Useful Life of Intangible Assets" (FSP 142-f). We understand the Board's primary intention behind FSP 142-f is to improve the consistency between useful lives utilized for amortization purposes in accordance with Statement 142, Goodwill and Other Intangible Assets, and the years of expected cash flows utilized to measure the fair value of intangible assets under Statement 141, Business Combinations. We believe that the proposed FSP meets this objective and is helpful in reconciling the differences between the two standards.

FSP 142-f also seeks to expand disclosure related to renewable intangible assets (i.e. weighted average remaining contractual life, renewal history, renewal cost information). In situations where there is a proven history of successful renewals and/or the cost of renewal is not significant, we do not believe this incremental disclosure will be particularly useful. Accordingly, we would recommend that these three disclosures only be required when there is substantive risk regarding the entity's ability to renew a particular intangible or where an entity's intent to renew is in question (for example, because the renewal cost is significant).

If, however, the FASB retains these disclosure requirements, we believe it would be more meaningful to apply the requirements to all intangible assets within a particular group rather than the subset of those acquired, renewed or extended after the effective date of the FSP.



Board Requested Comments (the Board's questions are shown in bold below)

1. What costs would be incurred to implement this proposed FSP?

We would not expect the costs of implementing the provisions of the proposed FSP to be significant for our company.

2. Are the transition provisions of this proposed FSP appropriate?

See observations articulated above regarding the incremental disclosure requirements.

3. Given this document's comment period, the Board expects to finalize this proposed FSP in the first quarter of 2008. Does this issuance date provide sufficient time for affected entities to understand and apply the requirements of this FSP, which is effective for fiscal years beginning after June 15, 2008?

The issuance date would appear to provide adequate time for us to understand and apply the requirements of the FSP.

We would be pleased to respond to any questions regarding our response as well as other aspects of the FSP. Please contact me or David Haskett, Director – Controllership Transaction Support at 818-973-4061.

Sincerely,

Brent Woodford

Senior Vice President, Planning & Control

The Walt Disney Company

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