



LETTER OF COMMENT NO. 5



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January 16, 2008

Mr. Robert Herz, Chairman
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116
File Reference: Proposed FSP FAS 142-f
Email: director@fasb.org

Re: Determination of the Useful Life of Intangible Assets

Dear Mr. Herz:

The Hartford Financial Services Group Inc. (“The Hartford” or “The Company”) appreciates the opportunity to comment on the Proposed FSP 142-f, *Determination of the Useful Life of Intangible Assets*. By proposing an amendment to paragraph 11d of Statement 142, *Goodwill and Other Intangible Assets* (SFAS 142), The Hartford believes that the FASB has taken a step in the right direction to ensure that consistency is achieved between the useful life of a recognized intangible asset and the period of expected cash flows used to measure the fair value of the asset.

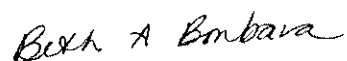
We believe that this amendment to SFAS 142 can be improved by considering not only the entity’s historical experience on renewing or extending similar arrangements, but also the likelihood/probability of expected future contract renewals or extensions. The probability of expected future renewals or extensions is important because historical renewal or extension experiences on similar arrangements may be a good starting point but not necessarily indicative of future renewal actions. For instance, changes in the general business economic environment may indicate that the renewal or extension of an arrangement may not be reasonably assured even if, under a favorable economic environment, the arrangement could be renewed or extended without substantial cost or material modifications. In addition, we believe that the incorporation of a likelihood/probability criterion in the proposed FSP is consistent with other accounting guidance. For example, FASB Statement 13, *Accounting for Leases* and related guidance incorporates the term “reasonably assured” as a criterion regarding the likelihood of renewals in the context of the lease term and renewal options. Further, other guidance including Interpretation 48, *Accounting for Uncertainties in Income Taxes* and Statement 141(Revised 2007), *Business Combinations* also incorporate the concepts of probability by using the “more likely than not” criterion.

Therefore, we suggest that paragraph 7 of the proposed FSP be revised to include language concerning the likelihood or probability of future contract renewals and extensions in addition to the consideration of an entity’s own historical experience in renewing or extending similar arrangements. Historical

experience alone should not be justification for assuming that an arrangement will be renewed or extended—either for the period of expected cash flows used to measure the fair value of the asset or for determining the amortization period. We believe that adding a probability criterion to the proposed FSP will result in a more robust determination of the useful life of an intangible asset and will be more consistent with similar accounting guidance.

We would be happy to discuss our comments in more detail with the Board or its staff. Please feel free to call me at (860) 547-4135 if you have any questions regarding this response.

Sincerely,

A handwritten signature in cursive script that reads "Beth A Bombara".

Beth A. Bombara
Senior Vice President, Controller and Chief Accounting Officer
The Hartford Financial Services Group, Inc.