

June 6, 2011

Sent via e-mail: director@fasb.org

Financial Accounting Standards Board 401 Merritt 7 PO Box 5116 Norwalk, CT 06856-5116

Re: File Reference No. 2011-180

AT&T Inc. is pleased to respond to the Financial Accounting Standards Board's ("FASB") exposure draft on "Testing Goodwill for Impairment". AT&T Inc. ("AT&T") is a publicly traded holding company whose subsidiaries and affiliates operate in the communications services industry both in the United States and internationally.

AT&T supports the Board's proposed changes and believes that the changes could potentially reduce overall costs and complexity as compared with the current process. We request that the Board consider a similar process for all indefinite lived intangibles. In general, we believe that we will choose to perform the proposed qualitative assessment before we would perform the first step of the two-step impairment test. However, we are pleased that the qualitative assessment is considered an optional step as we do believe there will be times when an entity would choose to bypass that assessment.

We believe the examples of events and circumstances that could be considered in the qualitative assessment are adequate, as it is clear that the list is not intended to be all inclusive. However, since an entity is also supposed to consider positive and mitigating events and circumstances in its evaluation, we believe the guidance should include examples of positive events as well.

AT&T agrees that the changes should apply to both public and non-public entities and we agree with the proposed effective date and early adoption provision.

Respectfully,

Paul Stephens

Senior Vice-President & Controller