

June 9, 2011

Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Via email: director@fasb.org

RE: File Reference No. 2011-180 - Intangibles-Goodwill and Other (Topic 350) Testing Goodwill for Impairment

Eastman Kodak Company appreciates the opportunity to provide comments to the Financial Accounting Standards Board ("FASB" or the "Board") regarding the Exposure Draft, *Testing Goodwill for Impairment*. We strongly support the Board's view that the use of an initial principles based qualitative screen in the goodwill impairment assessment will reduce complexity and costs by allowing for the use of more judgment without a fundamental change in the recognition of goodwill impairment losses.

We respectfully make the following comments for the Board's consideration:

- We believe that an expansion of the scope of the proposed guidance to include indefinite lived intangible assets would also allow for more judgment, while reducing complexity and costs, without creating a fundamental change in U.S. GAAP, and should therefore be pursued.
- Goodwill will need to be assessed for impairment each time financial statements are issued, under the proposed guidance, using the qualitative assessment at a minimum. Goodwill will need to be quantitatively tested for impairment whenever it is more likely than not that the fair value of a reporting unit is less than its carrying amount, or if it is more likely than not that a goodwill impairment exists if the carrying amount of the reporting unit is negative or zero. However, there will no longer be a requirement to perform a quantitative goodwill impairment test at least annually. Therefore, we believe there is no longer the need to explicitly require that goodwill impairment assessments occur annually.

We support the Board's continued efforts to simplify goodwill impairment testing and make accounting standards more principles based. We appreciate the narrowly focused scope of this proposal which should achieve near-term cost relief, but respectfully recommend that the FASB and International Accounting Standards Board initiate a joint project to comprehensively readdress this complex topic. While this proposal will certainly provide cost relief, there will still be substantial effort expended related to goodwill impairment testing for which the level of benefit received by financial statement users is unclear.

We appreciate your consideration of our opinions, and would be happy to discuss with you further.

Sincerely,

EASTMAN KODAK COMPANY

Eric H. Samuels

Eric H. Samuels
Chief Accounting Officer and Corporate Controller