

Michael W. Morrell Vice President One Verizon Way, 3rdFloor Basking Ridge, NJ 07920 Tel: (908) 559-1200 Fax: (908) 630-2600

michael.morrell@verizon.com

August 17, 2010

Mr. Russell G. Golden Technical Director FASB 401 Merritt 7, PO Box 5116 Norwalk, CT 06856-5116

Re:

File Reference Number: 1790-100

Proposed Accounting Standards Update - Statement of Comprehensive Income

Mr. Golden:

Verizon Communications Inc. (Verizon) appreciates the opportunity to comment on the Proposed Accounting Standards Update "Statement of Comprehensive Income". Verizon, one of the world's leading providers of communication services, is a registrant with the SEC and is classified as a Large Accelerated Filer.

While we support the FASB's ongoing effort to improve comparability, transparency, and consistency in financial reporting, we do not believe that this proposal furthers these objectives. Verizon basis its views on the fact that it does not use a Statement of Comprehensive Income internally to assess performance and its ongoing interaction with an investment community that includes over 40 banks and brokerage houses and more than 1,500 institutional shareholders.

We believe that the current reporting requirements for other comprehensive income are adequate. We suggest that the FASB retain this optional form of presentation.

Regards

Michael W. Morrell Vice President – Finance