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Ms. Susan M. Cospers
Technical Director
Financial Accounting Standards Board
401 Merritt 7, PO Box 5116
Norwalk, CT 06856-5116

File Reference No.: 2011-180, *Intangibles–Goodwill and Other (Topic 350); Testing for Goodwill Impairment*

Dear Ms. Cospers:

Verizon Communications Inc. (Verizon) is pleased to provide our comments on the Exposure Draft, *Testing Goodwill for Impairment*. Verizon is one of the world's leading providers of communication services, is a registrant with the SEC, and is classified as a large accelerated filer.

We fully support the provisions set forth in the Exposure Draft and commend the Board for taking a reasonable approach to address the concerns raised by preparers of financial statements. We believe that adding a qualitative assessment to the current two-step impairment test will significantly reduce unnecessary costs associated with calculating the fair value of a reporting unit when there is no reasonable evidence of a potential impairment.

We request that the FASB extend this qualitative assessment approach to impairment testing for all intangible assets with indefinite lives as the costs and efforts incurred in testing these are also significant.

Regards,

A handwritten signature in black ink, appearing to read "M. Morrell", with a long horizontal flourish extending to the right.

Michael W. Morrell
Vice President – Finance