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Matthew L. Schroeder
Managing Director
Global Head of Accounting Policy



June 3, 2011

Ms. Leslie Seidman
FASB Chairman
401 Merritt 7
PO Box 5116
Norwalk, CT 06856

Re: File Reference No. 2011-180 - Proposed Accounting Standards Update: Intangibles – Goodwill and Other (Topic 350), Testing Goodwill for Impairment

Dear Ms. Seidman:

Goldman Sachs appreciates the opportunity to provide comments on the Financial Accounting Standards Board's exposure draft on testing goodwill for impairment.

Goodwill impairment testing is time-consuming and involved. The current requirement to test goodwill for impairment at least annually results, in many cases, in a great deal of work when preparers know, intuitively, that the results of the quantitative testing will demonstrate that the asset is not impaired. We support the Board's efforts to simplify the testing requirements and eliminate unnecessary quantitative documentation.

If you have any questions or would like to further discuss our comments, please contact me at 212-357-8437.

Sincerely,

A handwritten signature in black ink that reads "Matthew L. Schroeder".

Matthew L. Schroeder