

Ameriprise Financial, Inc.
802 Ameriprise Financial Center
Minneapolis, MN 55474



Via Email: director@fasb.org

June 3, 2011

Ms. Susan M. Cospers
Technical Director
File Reference No. 2011-180
Financial Accounting Standards Board
401 Merritt 7
Post Office Box 5116
Norwalk, Connecticut 06856-5116

RE: File Reference No 2011-180

Dear Ms. Cospers:

Ameriprise Financial, Inc. (“we”, “Ameriprise”), appreciates the opportunity to offer comments with respect to the Proposed Accounting Standards Update, *Intangibles-Goodwill and Other (Topic 350)*, Testing Goodwill for Impairment (the “Proposed ASU”). We support the Financial Accounting Standards Board (the “FASB”, the “Board”) in its effort to simplify and reduce the cost of goodwill impairment testing. However, we believe the Proposed ASU will only significantly reduce the cost of goodwill impairment testing if the ability to qualitatively test for impairment is extended to indefinite-lived intangibles. We have incorporated our suggestions into our responses below.

Question 1: Please describe the entity or individual responding to this request.

Ameriprise Financial, Inc. is one of the nation’s leading financial planning, asset management and insurance companies. Ameriprise’s balance sheet includes approximately \$2.7 billion of goodwill and other intangible assets. The other intangible assets include both indefinite-lived and definite-lived intangibles.

Question 2: For preparers, do you believe that the proposed amendments will reduce overall costs and complexity compared with existing guidance? If not, please explain why.

We believe the qualitative assessment in the Proposed ASU will reduce the cost and complexity of the annual goodwill impairment test for many companies. We also believe the ability to use qualitative indicators to test indefinite-lived intangibles may be appropriate in many

circumstances. Without allowing a qualitative approach for indefinite-lived intangibles impairment testing, companies may still have to incur significant costs to test these intangibles while having the ability to use a qualitative approach when appropriate for goodwill impairment testing. Goodwill and indefinite-lived intangibles have similar characteristics and we believe allowing the qualitative approach for both would better align the impairment models.

Question 3: For preparers, do you expect your entity will choose to perform the qualitative assessment proposed in the amendments, or will your entity chose to proceed directly to performing the first step of the two-step impairment test? Please explain.

We may utilize the qualitative assessment for our goodwill impairment test without performing the two step goodwill impairment test under existing GAAP when appropriate. We would also likely use the qualitative assessment when appropriate for testing indefinite-lived intangibles for impairment if incorporated into the Proposed ASU.

Questions 4-5: Not applicable to preparers.

Question 6: Do you agree that the proposed examples of events and circumstances to be assessed are adequate? If not, what changes do you suggest?

We agree the proposed examples of events and circumstances are adequate and we understand the list is not all inclusive and all relevant events and circumstances should be considered.

Question 7: Do you agree that the guidance in the proposed amendments about how an entity should assess relevant events or circumstances is clear? If not, how can the guidance be improved?

We agree the Proposed ASU provides clear guidance regarding how an entity should assess the relevant events or circumstances.

Question 8: Do you agree with the Board's decision to make the proposed amendments applicable to both public entities and nonpublic entities? If not, please explain why.

We agree with the FASB's decision to make the amendments applicable to both public and nonpublic entities.

Question 9: Do you agree with the proposed effective date provisions? If not, please explain why.

We agree with the proposed effective date provisions.

Conclusion

In conclusion, we support the FASB's efforts to simplify testing of goodwill for impairment. We believe the Proposed ASU will simplify and reduce the cost of goodwill impairment testing particularly if the qualitative assessment is extended to indefinite-lived intangibles. Extending

the qualitative assessment to indefinite-lived intangibles will allow companies to reduce the cost and complexity of testing for those assets, which can be significant.

Thank you for your consideration of our comments on these important matters. If you have any questions, comments or would like further information, please contact me at (612) 678-4769.

Sincerely,

A handwritten signature in black ink, appearing to read "David K. Stewart". The signature is written in a cursive, flowing style.

David K. Stewart
Senior Vice President and Controller