June 1, 2011

Technical Director – File Reference No. 2011-180
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Comments to Exposure Draft on proposed Accounting Standards Update on Intangibles – Goodwill and Other (Topic 350): Testing Goodwill for Impairment

We appreciate the opportunity to comment on the Financial Accounting Standards Board ("Board") Exposure Draft on proposed Accounting Standards Update ("Update") on Intangibles – Goodwill and Other (Topic 350): Testing Goodwill for Impairment.

Altria Group, Inc. is a preparer of financial statements in accordance with accounting principles generally accepted in the United States of America ("U.S. GAAP"). Altria Group, Inc. is a large accelerated filer whose common stock securities are registered on the New York Stock Exchange.

Altria Group, Inc. is a holding company incorporated in the Commonwealth of Virginia in 1985. At December 31, 2010, Altria Group, Inc.'s wholly-owned subsidiaries included Philip Morris USA Inc., which is engaged in the manufacture and sale of cigarettes and certain smokeless products in the United States; UST LLC, which through its subsidiaries is engaged in the manufacture and sale of smokeless products and wine; and John Middleton Co., which is engaged in the manufacture and sale of machine-made large cigars and pipe tobacco. Philip Morris Capital Corporation, another wholly-owned subsidiary of Altria Group, Inc., maintains a portfolio of leveraged and direct finance leases. In addition, Altria Group, Inc. held a 27.1% economic and voting interest in SABMiller plc at December 31, 2010.

At December 31, 2010, Altria Group, Inc.'s balance sheet included approximately $5 billion in goodwill and approximately $12 billion in trademarks, which are classified as indefinite-lived intangible assets.

We commend the Board's effort to simplify how an entity is required to test goodwill for impairment by providing entities an option for assessing qualitative factors prior to determining if a quantitative test is required. However, we
recommend that the Board consider expanding the scope of the proposal to allow the same qualitative option for other indefinite-lived intangible assets.

Goodwill and other indefinite-lived intangible assets are very similar in nature and are not subject to amortization since they are not considered to be wasting assets. Many of the events and circumstances that would indicate impairment of a reporting unit’s goodwill would also indicate impairment of other indefinite-lived intangible assets. In addition, companies generally perform their annual goodwill and indefinite-lived intangible asset impairment tests concurrently. Consequently, the most impactful way to simplify the process and reduce overall expenses associated with the annual impairment test, without increasing the risk of delayed impairment loss recognition, is to extend the qualitative assessment option to both types of assets.

Thank you for your consideration.

Sincerely Yours,

[Signature]

Linda M. Warren
Vice President and Controller
Altria Group, Inc.