

HONEYWELL INTERNATIONAL INC.

September 9, 2008

Mr. Russell Golden
Director of Technical Application and Implementation Activities
Financial Accounting Standards Board
401 Merritt 7, PO Box 5116
Norwalk, CT 06856-5116

By email

Dear Russell:

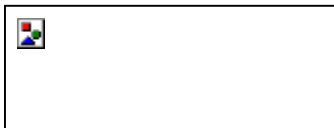
Honeywell International Inc. (Honeywell) is a \$37 billion diversified technology and manufacturing leader, servicing customers worldwide with aerospace products and services; control technologies for buildings, homes and industry; automotive products; turbochargers; and specialty materials. Based in Morris Township, N.J., Honeywell's shares are traded on the New York, London, and Chicago Stock Exchanges.

We appreciate the opportunity to offer comments on the ongoing project around EITF Issue No. 08-1, *Revenue Recognition for a Single Unit of Accounting*. We support the proposed changes to the EITF Issue No. 00-21, *Revenue Arrangements with Multiple Deliverables*. We believe the implementation will result in a more accurate reflection of companies' activities and more transparent information that will better serve the financial statement users.

However, in regards to the transition guidance associated with proposed EITF 08-1, Honeywell is concerned with the significant implementation costs associated with any type of retrospective application. Honeywell has approximately 160,000 customers worldwide, with whom numerous contracts are executed including a significant number of multiple element agreements, as such any retrospective analysis of individual customer contracts would prove to be extremely challenging and costly. Therefore, Honeywell fully supports a prospective application of EITF 08-1.

We appreciate the opportunity to submit these comments. If you have questions, or need additional information, please contact Talia Griep, Vice President and Corporate Controller.

Sincerely,



Talia M. Griep
Vice President and Corporate Controller