Michael W. Morrell
Vice President

One Verizon Way, 3rd Floor
Basking Ridge, NJ 07920
Tel: (908) 559-1200
Fax: (908) 630-2600
michael.morrell@verizon.com

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Mr. Russell G. Golden
Technical Director FASB
401 Merritt 7, PO Box 5116
Norwalk, CT 06856-5116

File References No. EITF 08-01 & 09-03

Re: Comment Letter - Draft Abstracts EITF Issue 08-1 and Issue 09-3

Mr. Golden:

Verizon Communications Inc. (Verizon) appreciates the opportunity to comment on the Draft Abstracts – EITF Issue 08-1 and Issue 09-3 (proposed EITF 08-1 and 09-3). Verizon is one of the world's leading provides of communication services, is a registrant with the SEC, classified as a Large Accelerated Filer. Verizon's consolidated Operating Revenue for the year ended December 31, 2008 was $97.4 billion.

We do not support the proposed EITF 08-1 and 09-3 due to the potential overlap with the FASB and IASB joint revenue recognition project. We believe proposed EITF 08-1 and 09-3 should be consistent with the objectives that the IASB and FASB has established in moving to a single set of authoritative principals-based accounting standards, consistent with the recommendations of the Financial Crisis Advisory Group. The joint revenue recognition discussion paper issued late last year is limited to the framework of revenue recognition requirements, and does not address specific application issues. While the changes may be consistent with the revenue recognition project in that it attempts to reflect the true economics of a transaction, we believe that the application guidance included in proposed EITF 08-1 and 09-3 is prescriptive and not consistent with the overall convergence efforts of the IASB and FASB. The guidance requires incidental components to be accounted for separately without appropriate consideration of the potential negligible impact on revenue in comparison to the incremental costs to implement this change.

The proposed changes would require a company to develop, document and support their best estimate of selling price for all elements, including those that are incidental, which would significantly impact the bookkeeping for such contracts. To implement these changes, significant modifications to point-of-sale systems, billing systems as well as the related accounting and reporting systems will be necessary. These system modifications would take a considerable amount of time and cost to implement, while the resulting revenue amount may not change materially to warrant the cost of such changes.

We believe the proposed additional disclosure requirements would not add to the substance of the financial information reported externally. Instead, the proposed disclosure requirements would likely distract, complicate and potentially confuse the average financial statement user. The disclosure requirements would add to the length and complexity for companies with multiple non-similar arrangements. In addition, for general purpose financial statements, such disclosures would not incrementally clarify an average users understanding of the key elements of the revenue recognition practices for such contracts and would potentially duplicate information required to be disclosed elsewhere (e.g., critical accounting estimates in management's discussion and analysis in SEC filings).

We would encourage you to review the comments raised in our comment letter dated June 17, 2009 related to the joint revenue recognition project (reference number 1660-100, comment letter number 31). In addition, the Financial Crisis Advisory Group's report to the FASB and IASB dated July 28, 2009 in which the recommendations focused on the need for the Boards to work towards convergence of maintaining and enhancing high quality accounting standards while reducing complexity to restore investor confidence. The proposed EITF would not appear to be a step in this direction.

Thank you for the opportunity to comment. We would be pleased to discuss our comments in more detail with members of the Task Force or Staff.

Regards,

Mike

Michael W. Morrell
Vice President – Finance