

6620 West Broad Street Richmond, VA 23230 www.genworth.com

Sent via email to director@fasb.org

June 3, 2011

Technical Director Financial Accounting Standards Board 401 Merritt 7 PO Box 5116 Norwalk, CT 06856-5116

RE: Testing Goodwill For Impairment (File Reference 2011-180)

Genworth Financial, Inc. ("Genworth") appreciates the opportunity to comment on the Financial Accounting Standards Board ("FASB" or the "Board") Exposure Draft on *Testing Goodwill For Impairment* (the "Proposal").

Genworth is a leading financial security company dedicated to providing insurance, wealth management, investment and financial solutions to more than 15 million customers, with a presence in more than 25 countries. We have goodwill and other indefinite-lived intangible assets that are required to be tested annually for impairment.

We agree with the Board's objective to simplify how an entity is required to test goodwill for impairment. Many of the same concerns about the cost and complexity of performing an impairment test for goodwill are equally applicable to other indefinite-lived (non-amortizing) intangible assets. Accordingly, we urge the Board to consider adding a similar qualitative assessment for impairment testing of indefinite-lived intangible assets.

We strongly support the Board's proposal and the related scope of the amendments, which include both public and nonpublic entities. Additionally, we support the proposed effective date that permits an entity to early adopt the finalized guidance. We expect these amendments will help reduce the costs to preparers associated with the annual goodwill impairment test. We urge the Board to finalize the proposed guidance shortly after considering constituent feedback since many calendar year end entities perform their annual assessment during the third quarter and could potentially benefit from early adopting the proposed amendments.

In addition to our support of the Proposal, we believe the Board should revise the existing goodwill impairment guidance related to the timing of the annual goodwill impairment test. While we recognize the need to perform an annual goodwill impairment test, the requirement in ASC 350-20-35-28 to perform the impairment test at the same time each year should be removed. There is insufficient justification for this requirement that creates undue costs for preparers in certain circumstances.

Under the proposal, an entity may still need to determine fair value of a reporting unit as a part of their annual goodwill impairment test. In many instances, the fair value of a reporting unit is based on inputs from internal forecasts that are updated at certain times of the year. While the timing of these forecasting procedures are generally consistent from year to year, there are situations where management determines the timing of these procedures should change to meet other business needs. In these cases, an entity may be required to replicate the forecasting procedures to ensure accurate inputs are utilized on the valuation date used for the annual goodwill impairment testing, rather than simply being able to align their annual goodwill testing date to the timing of their forecasting procedures. The replication of the forecasting procedures for the annual goodwill test may create undue costs on preparers that could be alleviated by increasing flexibility in the timing of the annual goodwill impairment testing.

In light of the reasons noted above, we urge the Board to replace the existing provision that requires goodwill testing be performed at the same time each year with a provision that requires an annual assessment to be performed with no more than 12 months between testing dates. This suggested change for the annual goodwill impairment test would align the goodwill impairment testing with the current impairment testing for indefinite-lived (non-amortizing) intangible assets, where the guidance only requires annual testing and does not specify that the testing should be performed at the same time each year.

We appreciate the opportunity to comment on the Proposal. If there are any questions regarding the content of this letter or you wish to discuss our comments and recommendations, please contact me at (804) 662-2685 or Matt Farney, our global accounting policy leader, at (804) 662-2447.

Sincerely,

Amy R. Corbin

Any R. Corbin

Vice President and Controller