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Sent via email to director@fasb.org

April 23, 2012

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

RE: *Testing Indefinite-Lived Intangible Assets* (File Reference 2012-100)

Genworth Financial, Inc. ("Genworth") appreciates the opportunity to comment on the Financial Accounting Standards Board ("FASB" or the "Board") Exposure Draft on *Testing Indefinite-Lived Intangible Assets* (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 licenses and certain management agreements that are classified as indefinite-lived intangible assets that are currently required to be tested annually for impairment.

We agree with the Board's objective to reduce the cost and complexity of performing an impairment test for indefinite-lived intangible assets other than goodwill and to improve consistency in impairment testing among long-lived asset categories.

We strongly support the Proposal and the proposed effective date that permits an entity to early adopt the finalized guidance. We expect to utilize the qualitative assessment permitted in the Proposal. Additionally, we expect the amendments in the Proposal will help reduce the costs to preparers associated with the annual impairment test for indefinite-lived intangible assets while not adversely impacting the timing of recognition of any impairment losses.

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

Amy R. Corbin
Vice President and Controller