The Goodyear Tire & Rubber Company

Akron, Ohio 44316-0001

April 24, 2012

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

File Reference No. 2012-100

RE: Proposed Accounting Standards Update – Intangibles – Goodwill and Other (Topic 350): Testing Indefinite-Lived Intangible Assets for Impairment

The Goodyear Tire & Rubber Company ("we", "us", "our") appreciates the opportunity to provide comments to the Board on the above referenced exposure draft. We support the Board's efforts to solicit feedback regarding its proposed changes for testing indefinite-lived intangible assets for impairment. We believe that this type of feedback is necessary in order to determine the benefits of moving to an initial qualitative assessment of indefinite-lived intangible asset impairment.

This proposal is similar to the Board's proposal on goodwill and we support the Board's decision to allow a qualitative based analysis for assessing indefinite-lived intangible asset impairment. Currently, many companies, including Goodyear, incur significant time and costs associated with performing annual valuations and assessments of these indefinite lived intangible assets.

Listed below are our responses to the Board's questions.

Question 1: Please describe the entity or the individual responding to this request. For example:

(a) Please indicate whether you primarily are a preparer, user, or auditor of financial statements or, if other, please specify.

The Goodyear Tire & Rubber Company is a preparer of financial statements in accordance with U.S. GAAP.

(b) If you are a preparer of financial statements, please indicate whether your entity is public or nonpublic and describe your primary business and its size (in terms of annual revenue, the number of employees, or other relevant metric). In addition, include a description of the type of indefinite-lived intangible assets held by your entity.

The Goodyear Tire & Rubber Company is one of the world's leading manufacturers of tires, with one of the most recognizable brand names in the world and operations in most

regions of the world. Goodyear's net sales for 2011 were \$23 billion, consisting of a broad global footprint with 53 manufacturing facilities in 22 countries, including the United States. We operate our business through four operating segments representing our regional tire businesses: North American Tire; Europe, Middle East and Africa Tire; Latin American Tire; and Asia Pacific Tire. Goodyear's primary indefinite-lived intangible assets consist of certain rights and trademarks associated with the manufacture, distribution and sale of brand name tires in specific markets.

Question 2: For preparers, do you believe that the proposed amendments will reduce overall costs and complexity compared with existing guidance? If not, please explain why.

Goodyear early adopted Accounting Standards Update No. 2011-08, Intangibles – Goodwill and Other (Topic 350): Testing Goodwill for Impairment. We performed our 2011 goodwill impairment test by first performing a qualitative assessment. We concluded that it was more-likely-than not that the fair value was in excess of the carrying amount for our reporting units with goodwill and therefore, we concluded goodwill was not impaired and we were not required to perform a quantitative analysis. By foregoing the quantitative assessment, we were able to eliminate a considerable amount of time, effort and cost. We think that the same principles can and should be applied to the annual indefinite-lived intangible asset impairment test.

We firmly believe that application of a qualitative assessment for our indefinite-lived intangible assets will reduce the overall time and costs associated with performing the annual impairment test. A qualitative approach allows us to assess the economic indicators, industry and market trends, overall operating environment, company specific results, share price and prior years' testing results and conclude as to the existence of potential impairment without the formality, cost and effort associated with the quantitative assessment. We believe that if the qualitative assessment shows improving or increasing trends in our business and provides a sufficient basis to conclude, then performing a quantitative analysis to validate our assessment would be unnecessary, costly and an inefficient use of internal resources.

Question 3: For preparers, do you expect your entity will choose to perform the qualitative assessment proposed in the amendments, or will your entity choose to proceed directly to performing the quantitative impairment test? Please explain.

We expect to choose to perform the qualitative assessment for the annual indefinite-lived intangible asset impairment test when circumstances permit. As previously stated, we believe the benefits associated with the qualitative assessment will allow us to reduce the time and cost burdens associated with calculating the fair value of our indefinite-lived intangible assets and comparing to the carrying value of those assets. However, we may choose to conduct a quantitative analysis in certain years (e.g. every 3 years), without first conducting a qualitative analysis, in order to provide an updated "baseline".

Question 6: Do you agree that the examples of events and circumstances in paragraph 350-20-35-3(a) through (e) are helpful in assessing whether significant inputs to the fair value measurement have changed significantly to indicate that it is more likely than not that an indefinite-lived intangible asset is impaired? If not, what additional examples of events and circumstances do you suggest?

We agree that the Board has provided a comprehensive list of events and circumstances with which to qualitatively assess indefinite-lived intangible asset impairment. While the list may not capture the totality of all events and circumstances specific to a particular company, it does provide a foundation and starting point that entities may use to initiate their assessment. Furthermore, it is a company's responsibility to assess the events, factors and circumstances that are unique to its operating environment.

Question 8: Do you agree with the proposed effective date provisions? If not, please explain why.

We agree with the Board's proposed effective date for entities with a fiscal year beginning after June 15, 2012, although we ask that the Board permit early adoption. Since many companies perform their annual impairment test in the third and fourth quarters, early adoption would allow them to adequately plan and perform the qualitative assessment for the annual indefinite-lived intangible asset impairment test within the required timeframe.

If the Board has any further questions, please contact me directly at (330) 796-2775.

Sincerely.

Richard J. Noechel

Vice President and Controller

The Goodyear Tire & Rubber Company

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