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Angela Stephens Sr. VP - Controller

June 6, 2011

via e-mail: director@fasb.org

Technical Director Financial Accounting Standards Board 301 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116

File Reference: No. 2011-180 Proposed Accounting Standards Update of Topic 350, *Intangibles – Goodwill and Other*

Dear Technical Director:

Dr Pepper Snapple Group, Inc. ("DPSG" or the "Company") appreciates the opportunity to comment on the April 22, 2011 Proposed Accounting Standards Update of Topic 350, *Intangibles – Goodwill and Other* (the "Proposal"), issued by the Financial Accounting Standards Board ("FASB" or the "Board").

Overall, we support the FASB in its objective to simplify how an entity is required to test goodwill for impairment. While the Proposal's approach seems to have met the FASB's stated objective, it significantly falls short in addressing potential concerns about the cost and complexity of performing the impairment testing for indefinite-lived intangible assets if the Proposal is issued as written. As such, we recommend that the Board re-consider the Proposal to either (i) specifically include indefinite-lived intangible assets within the Proposal or (ii) formalize the carryforward option outlined in Accounting Standards Codification ("ASC") 350-20-35-29 to include indefinite-lived intangible assets.

Question 1: Please describe the entity of individual responding to this request.

Response 1: DPSG is a public registrant traded on the New York Stock Exchange and one of the largest beverage companies in the Americas. We manufacture, market and distribute more than 50 brands of carbonated soft drinks, juices, ready-to-drink teas, mixers and other premium beverages across the United States, Canada, Mexico and the Caribbean. For the year ended December 31, 2010, DPSG recognized approximately \$5.6 billion in net sales and our balance sheet included approximately \$3.0 billion in goodwill and \$2.7 billion in other intangible assets, net. Of the \$2.7 billion recorded as other intangible assets, net, 99% of that balance represented various brands acquired throughout the history of the Company, which were determined to have indefinite useful lives.

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.

Response 2: We believe for a company with goodwill reported without any indefinite lived intangible assets, the Proposal would achieve its objective and reduce overall costs and complexity. However, for companies like DPSG, where goodwill and indefinite lived intangible assets are reported in the financial statements, the Proposal would not reduce overall costs and complexity.

As stated in *Response 1*, we have a significant balance of indefinite-lived intangible assets. We have, from time to time, analogized to ASC 350-20-35-29 to carryforward the fair value of a portion of our indefinite-lived intangible assets when we determined certain conditions were met. We believe, if the Proposal were implemented as written, we could have an offsetting effect where costs would be reduced for the goodwill impairment analysis but increased for the impairment analysis for our indefinite-lived intangible assets.

Based on our view, we highly recommend that the FASB consider extending the scope of the Proposal to indefinite-lived intangible assets, which would reduce the overall costs and complexity and meet its stated objective for both goodwill and indefinite-lived intangible assets.

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

Response 3: We expect to utilize the qualitative assessment in the Proposal in order to determine if the two-step impairment test is required. As noted in our leading statement, we believe this guidance included in the Proposal should be extended to indefinite-lived intangible assets as well. If the qualitative assessment in the Proposal was extended to indefinite-lived intangible assets, we would also choose to perform the qualitative assessment.

Question 4: For auditors, do you believe that the proposed amendments will reduce overall costs and complexity compared with the existing guidance? If not, please explain why. Does your response differ based on whether the entity is public or nonpublic?

Response 4: Not applicable to preparers. However, we would expect to see a reduction in the overall costs from our auditors in line with the FASB's stated objective of the Proposal.

Question 5: For users, do you believe that the qualitative approach for testing goodwill for impairment will delay the recognition of goodwill impairment losses or affect how you evaluate goodwill reported in the financial statements? If yes, please explain.

Response 5: Not applicable to preparers.

Question 6: Do you agree that the proposed examples of events and circumstances to be assessed are adequate? If not, what changes do you suggest?

Response 6: We believe the examples of events and circumstances to be assessed within the Proposal to be adequate. We recognize that the list is not meant to be an all-inclusive list, but rather a guide for management to use when documenting their professional judgment in determining whether the two-step impairment test is required.

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Question 7: Do you agree that the guidance in the proposed amendments about how an entity should assess relevant events or circumstances is clear? If not, how can the guidance be improved?

Response 7: We believe the Proposal is clear as to how an entity should assess relevant events or circumstances.

Question 8: Do you agree with the Board's decision to make the proposed amendments applicable to both public entities and nonpublic entities? If not, please explain why.

Response 8: We agree with the Board's decision to make the amendments to both public and nonpublic entities.

Question 9: Do you agree with the proposed effective date provisions? If not, please explain why.

Response 9: We agree with the proposed effective date provisions.

If you have any questions on this letter, please feel free to call me at (972) 673-5762 or e-mail me at angela.stephens@dpsg.com.

Sincerely,

Angela Stephens

Senior Vice President – Controller Dr Pepper Snapple Group, Inc.