

May 11, 2015

Russell G. Golden
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Re: ASU Topic 606 - Deferral of the Effective Date

Dear Mr. Golden:

Raytheon Company commends the Financial Accounting Standards Board (the "Board") on the issuance of Accounting Standards Update No. 2014-09, *Revenue from Contracts with Customers* ("ASU 2014-09" or "the new standard"). Raytheon Company, with 2014 sales of \$23 billion and 61,000 employees worldwide, is a technology and innovation leader specializing in defense, security and civil markets throughout the world. With a history of innovation spanning 93 years, Raytheon provides state-of-the-art electronics, mission systems integration and other capabilities in the areas of sensing; effects; and command, control, communications and intelligence systems, as well as cyber security and a broad range of mission support services. Raytheon is headquartered in Waltham, Massachusetts.

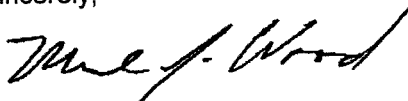
We are a major supplier to the U.S. Government and are committed to strong corporate governance, including accountability to our stockholders and transparent disclosure. We seek to provide the highest level of financial reporting for the benefit of our investors in the U.S. market and across the globe. Accordingly, we have followed the Board's revenue recognition project closely and we remain committed to a successful implementation of the new standard.

We support deferral of the effective date of the new standard by one year or more. We also support the Board's proposal to permit earlier application as of the original effective date of ASU 2014-09. We think these proposals would provide companies with the flexibility they need to implement the new standard successfully in their respective circumstances. Deferral is necessary for some companies because of the broad scope of the new standard, the pending standard-setting activity related to the new standard, ongoing industry discussions about how to interpret the new standard, and the resulting impact of the new standard on companies' diverse processes, systems, internal controls, policies, compensation programs, training, and communications (both internal and external).

We acknowledge that permitting earlier application will create temporary diversity in reported revenues across companies due to different accounting standards being applied to similar transactions. However, we think the benefits of early application outweigh the costs. Permitting earlier application avoids unnecessary implementation costs for companies that can adopt the standard as of the original effective date of ASU 2014-09. Allowing earlier application also is consistent with International Financial Reporting Standards (IFRS) 15, *Revenue from Contracts with Customers*. Moreover, some of the diversity will be mitigated by companies' disclosures of the impact of recently issued accounting standards.

Please do not hesitate to contact us with any questions or to discuss this topic further.

Sincerely,



Michael J. Wood
Vice President, Controller and Chief Accounting Officer