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August 3, 2015

Mr. Russell Golden
Chairman, Financial Accounting Standards Board

401 Merritt 7
PO Box 5116
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Submitted via electronic mail to director@fasb.org

File Reference No. 2015-280 Investments—Equity Method and Joint Ventures (Topic 323): Simplifying the Equity Method of Accounting

Dear Mr. Golden:

Intel is pleased to respond to your request for comment on the Exposure Draft: *Investments – Equity Method and Joint Ventures (Topic 323): Simplifying the Equity Method of Accounting* (the ED). We support the Board's efforts to reduce existing complexity in equity method accounting through the elimination of certain costly and complicated requirements. Our detailed responses to the questions presented in the ED are included in an Appendix to this letter.

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Thank you for your consideration of the points outlined in this letter. If you have any further questions or would like to discuss our responses further, please contact me at (971) 215-7931, or Holly Grennan, Accounting Policy Controller, at (971) 215-4987.

Sincerely,

James G. Campbell

Vice President, Finance Corporate Controller

Intel Corporation

APPENDIX

I. Investments – Equity Method and Joint Ventures (Topic 323)

Question 1: Should accounting for the basis difference of equity method investments as if the investment were a consolidated subsidiary be eliminated? Why or why not? Would amortization of the entire basis difference through equity method earnings be preferable? If so, what would be the suggested amortization period?

We agree with the Financial Accounting Standards Board's (the FASB or Board's) proposal to eliminate the requirement to account for the basis difference of equity method investments. Obtaining the information necessary to calculate basis differences is often difficult and the calculation is subjective and time consuming. The costs of providing such information outweigh any potential benefit to the users of our financial statements.

Question 2: Should the accounting for capitalized interest, which adds to the basis of an entity's equity method investment and is amortized, also be eliminated for equity method investments? Why or why not?

We agree with the Board's proposal to eliminate the accounting for capitalized interest. For the reasons noted in our response to question 1, we believe the simplicity of the investor's proportionate share of income/losses of an investee provides the best information to users of the financial statements.

Question 3: Should an entity be required to apply the proposed amendments related to accounting for the basis difference on a modified prospective basis as of the effective date? Why or why not?

We agree the proposed amendments should be applied on a modified prospective basis as of the effective date because it is simple and cost effective, while still providing the users of our financial statements with useful information.

Question 4: Should an entity no longer be required to retroactively adopt the equity method of accounting if an investment qualifies for use of the equity method as a result of an increase in the level of ownership interest? Why or why not?

We agree with the Board's proposal to eliminate the requirement to retroactively adopt the equity method of accounting as a result of an increase in level of ownership or for any other reason, such as reconsideration of whether an investment is in-substance common stock. The equity method of accounting should only be used once the investment qualifies; to do otherwise would be to reflect circumstances that did not exist in prior periods.

Question 5: Should the proposed guidance to eliminate the requirement to retroactively adopt the equity method of accounting be applied prospectively? Why or why not?

We agree the proposed guidance to eliminate the requirement to retroactively adopt the equity method of accounting should be applied prospectively. The benefit of restating prior periods would not justify the cost in preparation and calculation.

Question 6: How much time will be necessary to adopt the amendments in this proposed Update? Should early adoption be permitted? Should the amount of time needed to apply the proposed amendments by entities other than public business entities be different from the amount of time needed by public business entities?

The proposed amendments would not take a significant amount of time to implement, should the Board decide to allow prospective adoption. Given that the proposed amendments are to effect simplification around equity method accounting, preparers should be permitted, but not required to adopt the proposals immediately.

Question 7: Would the proposed amendments meet the objective of the Simplification Initiative, which is to improve GAAP by reducing cost and complexity while maintaining or improving the usefulness of the information provided to users of financial statements? Why or why not?

The proposed amendments will reduce accounting costs and complexity, while maintaining and improving usefulness to investors. The current requirements are complex, costly and subjective in nature, without providing significant benefit to our users.