



Northrop Grumman Corporation
2980 Fairview Park Drive
Falls Church, Virginia 22042-4511

November 30, 2015

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

Subject: File Reference No. 2015-300

Dear Mr. Golden:

We appreciate the opportunity to comment on the exposure draft *Proposed Amendments to Statement of Financial Accounting Concepts No. 8 (CON 8)* related to the qualitative characteristics of useful financial information. Northrop Grumman is a leading global security company with annual sales of \$24 billion and approximately 65,000 employees.

We support the Board's definition of materiality and believe the amendment is an improvement to CON 8 as it resolves the inconsistency between the Concept Statements and the legal concept of materiality in the United States. It also clarifies the definition of materiality currently observed by the Board.

We also support the Board's decision to keep the definition of materiality in the Concept Statements, as it provides a necessary framework for preparers and users of financial statements.

Please contact me if you have any questions or if you would like to discuss these comments.

Respectfully,

A handwritten signature in blue ink that reads "Michael Hardesty". The signature is written in a cursive, flowing style.

Michael Hardesty
Corporate Vice President, Controller and Chief Accounting Officer