

July 13, 2016

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

Re: ASU Topic 350 - Simplifying the Accounting for Goodwill Impairment

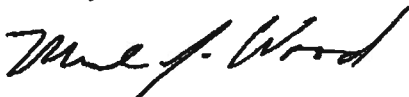
Dear Mr. Golden:

Raytheon Company appreciates the opportunity to comment on the proposed Accounting Standards Update, *Simplifying the Accounting for Goodwill Impairment* ("the proposed ASU"). Raytheon Company, with 2015 sales of \$23 billion and 61,000 employees, is a technology and innovation leader specializing in defense, civil government and cybersecurity solutions. With a history of innovation spanning 94 years, Raytheon provides state-of-the-art electronics, mission systems integration, C5ITM products and services, sensing, effects, and mission support for customers in more than 80 countries. Raytheon is headquartered in Waltham, Mass.

We support the simplification of goodwill accounting as detailed in the proposed ASU. We would also support the inclusion of an option to early adopt these changes. We think this proposal would lead to decreased costs and complexity while still providing investors with decision useful information which is consistent with the objective of the Financial Accounting Standards Board simplification projects. We support prospective application of these changes, believing that retrospective application would yield little benefit for the cost, and that the changes in this proposed ASU are not so broad that they would necessitate restating financial statements to enhance comparability between periods.

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