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Technical Director
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

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Re: Proposed Accounting Standards Update, Intangibles – Goodwill and Other (Topic 350) – *Simplifying the Accounting for Goodwill Impairment*

Verizon Communications Inc. (“Verizon”) appreciates the opportunity to comment on the Proposed Accounting Standards Update, Intangibles – Goodwill and Other (Topic 350) – *Simplifying the Accounting for Goodwill Impairment*. Verizon, one of the world’s leading providers of communications services, is a registrant with the Securities and Exchange Commission (the “SEC”) and is classified as a Large Accelerated Filer.

Verizon supports the Board’s proposal to simplify the accounting for goodwill impairment. We agree that eliminating the requirement to perform Step 2 would reduce the cost and complexity of financial reporting, while still retaining the usefulness of information reported to users of financial statements.

Verizon also encourages the Board to continue with Phase 2 of this project to simplify the subsequent accounting for goodwill.

Thank you for the opportunity to comment. We would be pleased to discuss our comments in more detail with the members of the Board or Staff.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Monty Garrett", written over a white background.

Monty Garrett
Senior Vice President - Accounting