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James L. Kroeker
Chief Accountant, Office of the Chief Accountant
US Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

File Reference No.: 4-600, *Commission Statement in Support of Convergence and Global Accounting Standards*

Dear Mr. Kroeker:

Verizon Communications Inc. (Verizon) is pleased to provide our comments on the Staff Paper, *Work Plan for the Consideration of Incorporating International Financial Reporting Standards into the Financial Reporting System for U.S. Issuers*. Verizon is one of the world's leading providers of communication services, is a registrant with the SEC, and is classified as a large accelerated filer.

Verizon appreciates the SEC's consideration of and we support progressing toward a single set of global accounting standards. We have been monitoring the approaches used by other countries when incorporating IFRS and the resulting challenges they faced during the transition process.

Based on our understanding, we believe the method of possible incorporation for U.S. issuers (coined "Condorsement") and supporting framework described in the Staff Paper is the most practical approach explored thus far. Compared to the full adoption on one established date approach (coined "Big Bang"), the Condorsement approach would minimize disruption to our business by providing the necessary time for the transition. We would need the proposed transition period of seven years in order to fully assess the impact of the standards, appropriately train our employees, and modify our systems and internal controls accordingly.

Another benefit to this approach of implementation is that the complexities and challenges associated with changing references to U.S. regulatory and contractual documents would be mitigated. The efforts associated with revising regulatory guidance would reside with the regulatory bodies and not the individual companies.

In addition, we support the proposed SEC and FASB roles under this approach. Retaining this structure is imperative to ensure that U.S. constituents' views are considered in future standard setting.

There are some areas that we believe need to be given further consideration and clarification. First, the framework suggests that "Category 3" IFRSs would be applied prospectively whenever possible. We request further clarification on how comparatives would be presented if we were required to report both under existing U.S. GAAP and "Condorsed" U.S. GAAP concurrently.

Secondly, we believe there should be a definitive timeline for transition and we request that the SEC, FASB and IASB work together to develop a structured timeline. It is conducive for large companies to address change if we can reasonably anticipate the upcoming deadlines. For example, it would be ideal if there were a set number of IFRSs to address each quarter with all adoptions finalized for that quarter on one set date. This would allow us to effectively plan and manage our adoption. We also ask that the SEC disallow early adoption of standards during the transition period to maintain consistency in reporting amongst U.S. issuers.

Lastly, during the transition period, the IASB should cease making any changes to existing standards or if changes are anticipated, they should be made in advance of the U.S. adoption of those specific standards.

Regards,

A handwritten signature in black ink, appearing to read "M. Morrell". The signature is fluid and cursive, with the first letter of the first name being a large, stylized 'M'.

Michael W. Morrell
Vice President – Finance