



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. 2015-310

Dear Mr. Golden:

We appreciate the opportunity to comment on the exposure draft *Assessing Whether Disclosures are Material*. Northrop Grumman is a leading global security company with annual sales of \$24 billion and approximately 65,000 employees.

We support the proposed amendments as they are well aligned with the Board's objective of improving the effectiveness of financial statement disclosures through its disclosure framework project. In particular, we believe the Board's clarification that materiality should be applied to quantitative and qualitative disclosures in the context of the financial statements taken as a whole will allow preparers to eliminate immaterial disclosures and place greater emphasis on matters that are most useful to financial statement users.

We also agree with the Board that omission of an immaterial disclosure should not be considered an accounting error and we support the Board's recommendation to make the proposed amendments effective upon issuance.

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

Respectfully,

A handwritten signature in blue ink, reading 'Michael Hardesty' with a stylized flourish at the end.

Michael Hardesty
Corporate Vice President, Controller and Chief Accounting Officer