

June 15, 2004

Director of Major Projects
Financial Accounting Standards Board
410 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Letter of Comment No: 4393
File Reference: 1102-100

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Dear Sir or Madam:

Thank you for the opportunity to comment on the Exposure Draft: Proposed Statement of Financial Accounting Standards for Share-Based Payment. Transcitive, now a part of Computershare, supports the stock plan administration function for almost 3,000 companies in North America. These companies range from the likes of Microsoft and General Electric to a host of privately held companies that utilize our solutions to manage their stock plans and to generate FASB compliance. As such, we have a responsibility to maintain FASB compliance in a timely and complete manner.

We understand and appreciate the need for changes in the current regulatory structure and stand ready to support the FASB in any new regulations that it may promulgate. However, in our opinion, the timetable for compliance proposed by FASB (for reporting periods beginning in Q1 2005) is insufficient to allow for the development and implementation of the solutions corporate issuers will need to ensure accurate statutory financial reporting. Release by FASB of the final standard during the fourth quarter of 2004 leaves a window of less than three months to achieve compliance.

Our solutions include a range of complex modeling, analysis, and reporting tools designed specifically to address regulatory issues such as SFAS 123. The proposed changes to the existing standard are significant; requiring a lengthy application development cycle including requirements analysis, system design, application development, quality assurance testing and beta test phases. The completed applications must then be deployed to administrative service providers and plan sponsors. The proposed changes will also require corporate finance personnel to develop new processes to perform the required modeling and analysis needed for the new lattice binomial methods for valuing equity awards prior to completing financial reports.

Our customers require our commitment to maintaining our services and applications to help them comply with the FASB's new requirements. Issuers expect accurate administration and reporting systems to support their financial reporting needs. We are highly concerned that the compressed timeframe proposed by FASB is insufficient to adequately complete the tremendous implementation effort needed to accomplish this task. The all too short period between the release of the final standard and the deadline for compliance introduces a grave risk for issuers of erroneous reporting (and the potential for restatements) during the first few quarters post the effective date of these requirements.

We respectfully urge the FASB to reconsider the timing of implementing the exposure draft. We recommend a minimum of 12 calendar months between releasing the final statement until its required implementation date.

Thank you for your consideration.

Sincerely,



Les Trachtman
President & CEO