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Letter of Comment No: 6472  
File Reference: 1102-100

Via: Electronic Mail  
director@fasb.org  
Attn: Suzanne Bielstein

RE: FASB, IRS, DOL

Dear Suzanne:

*I have attached some comments regarding Employee Stock Purchase Plan FASB regulation. I have been out of the office and hope that you will still consider these comments while considering the FASB regulations on this topic.*

*On behalf of the good people of Advance Auto Parts, I want to express our company's desire to maintain the beneficial value of employee stock purchase plans under current accounting rules.*

*The people of Advance have worked hard for many years to become ranked number 491 among the Fortune 500 companies for 2003. As a new Fortune 500 company, our stock purchase plan allows a large number of our Team Members to share ownership in our growing, successful business. Most of our plan's participants could not otherwise purchase shares – especially with a 15% discount as currently available in our plan.*

*We have consistently been conservative in our strategic use of stock options because of the complexity involved for Team Members. Conversely, we believe our stock purchase plan offers a simple method to build wealth for Team Members while also connecting them to company performance. In the first year of our stock purchase plan, we have enabled the purchase of more than 125,000 shares by Team Members. Our company is an advocate of maintaining the ability to extend the following features allowed under the 423 Stock Purchase Regulation:*

- "Look Back" feature
- 15% discount price

*We believe a differentiation of the stock purchase and stock option plan accounting treatment is justifiable, allowing our Team Members to enjoy the ability to build part of their future through the stock purchase plan. As such, we support any legislation or regulation that preserves the features of stock purchase plans as we know them today, and oppose application of the proposed stock option expense regulations to stock purchase plans.*

Sincerely,

/s/ Rich Moore