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**Letter of Comment No: 4058**  
**File Reference: 1102-100**

**From:** Dale Harrington [dharrington@sierrahealth.com]  
**Sent:** Wednesday, June 09, 2004 11:14 PM  
**To:** Director - FASB  
**Subject:** Share-Based Payment Exposure Draft

Dale Harrington  
3813 Ricebird Way  
North Las Vegas, Nevada 89084

June 9, 2004

Ms. Suzanne Bielstein  
Financial Accounting Standards Board  
401 Merrit 7  
Norwalk, CT 06856-5116

Dear Ms. Bielstein:

Re: Share-Based Payment Exposure Draft

I work for a company that allows employees to purchase my employer's stock at a discount through an Employee Stock Purchase Plan (ESPP). I understand that the Financial Accounting Standards Board (FASB) has proposed a change to accounting standards that would require my company to count this discount as an expense against its earnings (Share-Based Payment exposure draft). I respectfully request that you reconsider this proposal and not require expensing of the discount allowed in ESPPs.

I am concerned that required expensing of the discount in the ESPP may make this valuable benefit plan less attractive to my employer, potentially causing my employer to either discontinue the plan, or reduce or eliminate the current discount. If the discount is greatly reduced or eliminated, buying company stock through the ESPP would no longer be much of a benefit. Unlike benefits aimed only at high-paid executives, this is a valuable benefit for employees across the company.

The ESPP is a very important benefit to me. Being able to participate in an ESPP has enabled me to invest in my financial future and experience a sense of ownership in my company. This benefit helped attract me to and serves as an incentive for me to remain with my employer. I could even say I continuously strive to perform to the best of my ability because I am an owner of the company.

The ESPP that my company offers its employees has been a great incentive both financially and personally to Sierra's workforce. Playing an active part in the growth of our company by having the ability to purchase shares of company stock at affordable prices is both a morale boost and an obvious financial incentive to better one's position in life. It has been instrumental in allowing the average worker to go beyond his/hers financial means, allowing them to enhance the lives of their families. Thus, making it possible for individuals to attain the financial freedom to afford better homes in better neighborhoods, allowing their children to attend better schools, afford college, etc. If the FASB implements its proposed Share-Based Payment exposure draft, one of the greatest personal incentives for the average worker would be eliminated. Why, in a time of outrageous gasoline prices, increased power rates, and the threat of the almost certain return of higher interest rates, would the FASB consider taking away one of the few financial advantages available to the workers of America?