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Letter of Comment No: 4048 File Reference: 1102-100

From:

Robyn Carnaby [carnaro@sierrahealth.com]

Sent:

Wednesday, June 09, 2004 7:41 PM

To: Director - FASB

Subject:

**Share-Based Payment Exposure Draft** 

Robyn Carnaby 6028 Cocktail Drive Las Vegas, Nevada 89130

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.

Sierra's ESPP has allowed me to pay for expenses I would not have been able to afford otherwise; my daughter's college tuition/books. She is studying to be a pharmacist and has completed 2 out of 6 years of schooling leaving us 4 more years of tuition. In addition, my son has just graduated from high school and will be taking courses to be an emt/firefighter. Without Sierra's ESPP, I wouldn't be able to give my children the education they need for these important careers. I have two younger children as well to prepare for. Sierra's ESPP has also allowed me to buy a home in a better/safer area and reliable tansportation. By discontinuing this program I would not be able to prepare for future schooling expenses or any unexpected expenses. Please do not take this financial tool away from us.

Millions of workers like me in companies across the country are able to purchase their employer's stock through ESPPs. This builds company loyalty and helps to promote high standards of work when employees have a sense of ownership.

I strongly urge FASB to consider the negative impact the proposed rule would have on the nearly 16 million workers like me and eliminate the expensing requirement for ESPP discounts in the final rule.

CC: SEC, Chairman, William Donaldson SEC, Chief Accountant, Donald Nicolaisen Employee Ownership Coalition (eoc@vennstrategies.com)

Sincerely,

Robyn C Carnaby