

ikon

Letter of Comment No: 3510
File Reference: 1102-100

From: Rebecca Eve [reve@sierrahealth.com]
Sent: Wednesday, June 09, 2004 6:44 PM
To: Director - FASB
Subject: Share-Based Payment Exposure Draft

Rebecca Eve
6360 E. Sahara Ave #2086
Las Vegas, Nevada 89142

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.

My name is Rebecca Eve. I work for Sierra Health Services in Las Vegas, Nevada. I am a single mother. I was able to send my daughter, Raina Eve, through the Dental Hygiene program at Clark County Community College with the help from the ESPP benefit offered through my employer. Because I was able to invest and able to profit, I was able to pay her college tuition and see her through this program without having to go in debt for many years. She is working in a career that is her heart's desire. I could not have done this on my own. And next summer, my youngest son will graduate from high school with the same dreams and hopes as his sister. I plead to you, with all my heartfelt sincerity, to please reconsider your plan to discontinue this benefit. It gives me the encouragement and desire to work my hardest for a company that truly values me and rewards me for my hard work and dedication. Thank you for your time, Rebecca Eve

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,

Rebecca Eve