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To: Director - FASB
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Chairman Robert H. Herz,

I am writing to you in opposition of the broad based expensing of employee stock options. Having lived and worked for 20 years in Silicon Valley, I can firmly state that stock options are the lifeblood of this innovative economy. Broad-based expensing of options will absolutely cause companies to become much more stingy with the options for the rank and file employees, who absolutely deserve them.

We have had secretaries, clerical staff, assembly line workers, etc RETIRE based on the stock options they recieved when they joined young, fast growing companies -- this is the American dream -- so don't kill it!!

Address the two real problems - senior executive compensation and full disclosure.

1) Go ahead and force companies to do some expensing of the executive options for the top 10 employees - at least have them charge some reserves. These are the individuals that can end up with 1-10% ownership in the form of options, which can significantly impact shareholder value. These are the individuals that all people are shocked about when they see the magnitude of compensation.

2) Better disclosure in the financial notes. Listen to the institutional investors and stock analysts as to what their needs are for understanding the dilutive affect of options, and have full disclosure in the notes sections of financial statements. Ask companies to provide a full schedule of options that have been granted, when they vest, against a table of different strike prices, so that the dilutive affect can be easily calculated. They will make dilution adjustments as appropriate, and publish those details in their analyst reports, which are available through Yahoo, Schwab, etc to the common investor.

Regards
Michael Hilberman