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**Letter of Comment No: 3742**  
**File Reference: 1102-100**

**From:** Charles Sawyer [chsawyer@cisco.com]  
**Sent:** Thursday, June 10, 2004 12:17 PM  
**To:** Director - FASB  
**Subject:** File Reference No. 1102-100



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Chairman Robert H. Herz

As a U.S. based employee of Cisco Systems of San Jose, California, I ask that you consider not allowing the expensing of stock options, especially at an unrealistically high valuation. Over the last five years Stock Options have provided me with the perspective of putting the company and fellow employees best interests before my own. This has also created a nice financial return for my family.

Please consider the following issues specifically:

**Accounting Issues:**

The artificially high valuation for a stock option required by FASB will eliminate stock options as a tool which has driven innovation and productivity.

Stock options do not meet the definition of an expense because they do not use company assets.

The true cost of a stock option is dilution of earnings per share (EPS) and is already accounted for when options are exercised.

**Competition:**

U.S. companies need stock options to compete with other countries on a global basis. (Example: Chinese companies use stock options and they do not treat them as an expense.)

Expensing stock options could have a dramatic impact on American high tech leadership, innovation and job creation. In today's economic environment, the number one rule should be 'first, do no harm'.

Thank you.

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