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Letter of Comment No: 2335
File Reference: 1102-100

From: dkang@powerint.com
Sent: Wednesday, May 12, 2004 1:43 PM
To: Director - FASB
Subject: File Reference No. 1102-100, Comment on FASB Stock Option Proposal



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Dear Mr. Robert Herz:

I am writing in reference to FASB's invitation to comment on its exposure draft, "Share-Based Payment," an amendment of Statements No. 123 and 95. Dear (contact name will be automatically filled in here):

I am writing in reference to FASB's invitation to comment on its exposure draft, "Share-Based Payment," an amendment of Statements No. 123 and 95.

I don't think it is fair for FASB to force our company to estimate the value of employee options, using an economic formula, and either reduce their reported earnings by the amount of that estimate or report in a footnote to the financial statement the impact such options might have on earnings.

I don't believe that the valuation formulae, which were designed for a different purpose, accurately reflect in any way the value of long-term employee options and believes that using these numbers or any other numbers for financial statements would degrade the quality of reported earnings and further mislead investors.

Sincerely,

Doug Kang
1319 centennial ct
san jose, CA 95129