ikon

Letter of Comment No: 3978 - File Reference: 1102-100

From: Sent: Joseph Vidales [Vitys@aol.com] Monday, June 14, 2004 10:27 AM Director - FASB

То:

Subject: Share-Based Payment Exposure Draft

Joseph Vidales 3540 Katmai Dr Las Vegas, NV 89122

June 14, 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.

I cannot understand why the FASB would act to take away a benefit that would afect the American family of the United States of America in such a detrimental way. It would affect our children's college educations, that many have used this benefit for. It would affect the quality of life for americans who would have a better quality of life at retirement and it would affect America and its economy in the long run. Why not consentrate the monies and energies of this board to monitor the Government waste of ou tax dollors, such as the 100 million dollars in airline tickets that were upgraded or unclaimed and this list of colossal government waste of our tax dollars goes on and on and on. I am an employee of Sierra Health Services, my position is Senior prepress technician.

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,

Joseph R Vidales