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Letter of Comment No: 3947
File Reference: 1102-100

From: Joseph Petti [jdpetti@comcast.net]
Sent: Thursday, June 10, 2004 1:38 PM
To: Director - FASB
Subject: Share-Based Payment Exposure Draft

Joseph Petti
4604 Autumn Woods Way
Ellicott City, MD 21043

June 10, 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.

It is very important to understand that the ESPP program has enabled employees the ability to put a little extra money towards funding our childrens education. Why in the world would the Financial Accounting Standards Board propose such a ridiculous and ludicrous change to the accounting standards? It is most likely to discourage companies like ours who offer an ESPP to stop offering the program, therefore taking away a valueable benefit from thousands of employees nationally.

It seems to me the FASB has a little to much time on their hands and should be looking at ways to fix the economy rather than punish those who are economic stimulators. Stop trying to self justify your existence and allow this very important benefit offering to exists.

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 D. Petti