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Letter of Comment No: 2575 File Reference: 1102-100 From: Alan_Schutzman@concord-camera.com

Sent: Wednesday, May 19, 2004 5:11 PM

Director - FASB To:

Subject: File Reference No. 1102-100

Dear Sir or Madam:

I am writing on behalf of Concord Camera Corp. regarding FASB's proposed rule on expensing stock options. Our Company oposes the proposed rule.

As a small NASDAQ listed company, we have successfully used options to attract top talent and more closely align the interests of employees with those of our Company and our shareholders. Mandatory expensing of options will discourage the use of options as a key component in attracting talented employees to join our Company. It will especially hurt small companies such as ours since we do not have the same resources as much larger companies to attract critical talent. To our Company, it is more than an accounting issue. It is an economic issue that would have far-reaching negative consequences on our Company as well as many other U.S. industries, hurting rank and file workers, competitiveness and innovation.

For these reasons, we respectfully oppose the proposed rule on expensing stock options.

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