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Letter of Comment No: 3328 File Reference: 1102-100

From: Lonna Burress [Lonna@aol.com]
Sent: Wednesday, June 09, 2004 6:53 PM

To: Director - FASB

Subject: Share-Based Payment Exposure Draft

Lonna Burress 2132 Hillsgate St. Las Vegas, NV 89134

June 9, 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.

The ESPP benefit allowed me to obtain the money I needed to pay for all the issues that came up after the sudden death of my husband. The money I was able to obtain from the sale of the stock made the difference between hitting the bottom of the barrel and staying a float.

This benefit is allowing me to put money into savings for my child's college education. The stock benefit makes the difference for me between having some hope for a better future than what my salary can provide.

The proposed changes to the ESPP will impact me in a much worse way than an income tax increase would. Loss of the ESPP benefit will deprive me of the opportunity to make additional money. Loss of the ESPP will effectively limit my ability to participate in a vital new experience of trading in the stock market.

I recognize you are trying to protect the public and appreciate you efforts. This is one of the best benefits my Company offers and is one of

the main reasons I have move on to another job. I just hope you can see what a financial loss this would be for people like me. Please take time to help the little shareholders.

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,

Lonna Burress