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**Letter of Comment No: 3326**  
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**From:** Bethany Howard [bethow@yahoo.com]  
**Sent:** Wednesday, June 09, 2004 6:04 PM  
**To:** Director - FASB  
**Subject:** Share-Based Payment Exposure Draft

Bethany Howard  
1200 N Lamb #95  
Las Vegas, NV 89110

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.

It is infuriating to realize that there is another benefit that the Republicans seem determined to shove down the throats of the working class people in order to give tax breaks to the rich. I am beginning to believe that the Republican party is determined to eliminate the middle class from our society. The ESPP allows even working families who struggle from payday to payday to put a little away and invest in their own future, the future of the company for whom they work and make the country on a whole stronger. Please do NOT take away this vital benefit.

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.