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Letter of Comment No: 3575 File Reference: 1102-100

From: Sent:

Lori Rogers [Irogers@sierrahealth.com] Wednesday, June 09, 2004 6:32 PM

To: Subject: Director - FASB

Share-Based Payment Exposure Draft

Lori Rogers 10232 Abano Ct. 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.

My name is Lori Rogers. My husband and I moved to Las Vegas one and a half years ago. When I started looking for a career as a an Registered Nurse, Sierra Health Services appealed to me due to the excellent benefits they could offer, one of which being the Stock Option Plan. I have purchased twice with the company. As a nurse, this has offered several avenues for providing for my family. One example I would like to share with you: As our two year old son is ready to attend school, we wanted the option to provide funding for Private Schooling for our child. This was one means of being able to support this. With out this benefit, this would have not been as likely to achieve. This is just one thought of many that we have thought about. As a manager with in this company, I have seen the many faces of change in Morale. I can tell you that when morale goes down and you point to the wonderful benefits this company has to offer....the atmosphere changes for the better. It is called employee retention. And in the days with such high unemployment and turn over, why take away another wonderful benefit. The sacrifice from being away from your children, spouse, and other loved ones needs to have a little perks

other than the wages we employees recieve.

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,

Lori R. Rogers