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From: Mark_Schreiber@amat.com

Sent: Monday, June 28, 2004 1:14 PM

To: Director - FASB

Subject: PLEASE DO NOT IMPLEMENT "EXPENSING" OF STOCK OPTIONS

Letter of Comment No: 5567 File Reference: 1102-100

Hello,

I am concerned that the current proposals to report stock options as an expense will further confuse, not clarify, the financial reporting of companies. You've heard all of the arguments so, rather than regurgitate, let me voice my own spin...

Coming from the point of view that I greatly favor open and meaningful reporting, both personally and professionally, I think that companies should represent the best, most meaningful information about outstanding stock options. Investors and analysts can process this information according to their own models and expectations and infer the effect outstanding options should have through share dilution or whatever. The information most needed for this analysis is the number of options outstanding and the strike price(s), data that is already provided.

By comparison, requiring greater reporting (i.e. treating stock options as an expense) will likely create two unintended consequences. First, the data will become less, not more comparable between companies using differing assumptions. Second, the data will become more easily manipulated by those seeking to obfuscate the true implications. No shareholder will benefit from either of these outcomes.

Best Regards, Mark.