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Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116
Attention: Robert H. Herz, Chairman
VIA FAX: 203/849-9714

Dear Mr. Herz,

As the Chief Executive Officer of Lionbridge Technologies, Inc. (NASDAQ:LIOX), a global IT services company, I am contacting you to request the reconsideration by the FASB of its proposals regarding the expensing of stock options. In addition, I urge your support of the Stock Option Accounting Reform Act of 2003 (S. 1890 and H.R. 3574).

As a growing organization that continues to responsibly award stock options to attract and retain employees, Lionbridge believes the proposed legislation appropriately responds to concerns over executive compensation by addressing the accounting for options granted to senior corporate executives, without unnecessarily diminishing the proven benefits and value of broad-based stock option plans.

Lionbridge provides a compelling case study of the value of broad-based stock option plans for fostering economic growth. Stock options have provided Lionbridge with an effective vehicle to incent, motivate and retain employees, particularly through the "post-bubble" challenges of 2001 and 2002. During our six-year journey from start-up to profitability, our broad-based stock option plans have played a key role in keeping employees focused, committed and aligned with stockholders. In the past year, thanks to the dedication and commitment of our management and our employees, we recorded our first profitable year, paid off all of our debt and increased our stock price substantially. It is gratifying that our employees as well as our stockholders are benefiting from this business growth and financial performance.

While I am sensitive to the arguments advanced by the FASB in favor of expensing of stock options, it is critically important that the economic impact of such a proposal be thoroughly assessed before such a plan is implemented. In particular, the valuation

models proposed by the FASB merit further study before they are imposed across the board, to ensure that they do not result in adverse consequences to employees, additional costs to employers or confusion to stockholders. I am particularly concerned that the various valuation models proposed by the FASB will lead to inconsistent valuations, investor misinformation and overall market confusion. Irresponsible, rash decisions about stock option expensing could negatively impact both established and emerging U.S. companies. In doing so, we are impeding the market innovation, energy and growth that this country is based upon.

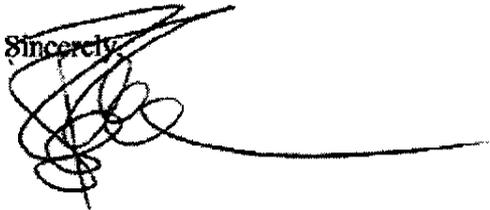
That is why I urge further study the impact on the economy and innovation prior to expensing of all stock options. Because the Stock Option Accounting Reform Act of Act would mandate expensing of stock options awarded to top executives of large companies, there would be sufficient time to learn from this limited implementation before imposing it across the board. This more prudent course of action will allow the concept of expensing of stock options to be assessed, evaluated and if necessary, fine-tuned before it is widely imposed.

Lionbridge's broad-based option program has helped align the interests of our employees with our stockholders. The irony of the current FASB proposal is that it may encourage the exact opposite of what it intends: companies that have sought to build an ownership culture by granting options to all employees will find that the more employees that participate in their stock option programs, the lower the company's earnings will be compared to other companies in the same industry that don't grant options broadly. Conversely, those companies that limit options to top management can fully expense options without major impact on the corporate bottom line.

In other words, many companies grant options to the vast majority - and often to 100 percent - of their employees. This is particularly relevant for companies in innovation-driven industries such as technology. If options are required to be treated the same as a cash expense, companies would drastically reduce the number of people who receive options and therefore the number of people that are incented and rewarded for generating superior client service and innovation - key drivers for any company's growth.

I thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to be "R. Herz", with a long horizontal line extending to the right.