Letter of Comment No: 5933 File Reference: 1102-100

David Turnbull

1801 Elm Lane, Okmulgee, OK 74447-5424

June 26, 2004 12:08 PM

Director, Major Projects and Technical Activities Financial Accounting Standards Board File Reference No. 1102-100 Share-Based Payment; an amendment of FASB Statements No. 123 and 95 Norwalk, CT 06856-5116

Subject: Make Companies Put Stock Options on the Books

Dear Director, Major Projects and Technical Activities Standards Board:

I strongly support your proposal to require companies to expense stock options. Not expensing stock options has promoted their overuse in CEO pay against the long-term interests of shareholders, and for the U.S. public who may depend upon vital services the corporation provides - and most time depends upon the services the corporation provides that fall under a state or federal regulatory agency (the fox watching the chicken coop) - I believe stock options provided a financial incentive for corporate executives like Enron executives to cook the books.

The retirement savings of America's working families depend in part on all companies, including small businesses and start-ups, having honest accounting practices. Companies that do not expense stock options are hiding their true cost from investors, creditors and other consumers of financial reports. In my opinion, stock option compensation should not receive preferential accounting treatment.

In conclusion, I urge you to require stock option expensing as soon as possible. Independent experts, such as the Financial Accounting Standards Board, should set the standards on stock option expensing, not the politicians in Washington. Stock options are a compensation expense, and this cost can be reliably estimated using your proposed accounting method. I believe corporate executives should be ashamed for trying to hide the cost of stock options from their investors.

Sincerely,

David Turnbull

cc:

Senator Richard Shelby Representative Barney Frank Representative Michael Oxley