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Letter of Comment No: 2343
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From: Juel, Hilary [hilary.juel@intel.com]
Sent: Wednesday, May 12, 2004 7:44 PM
To: Director - FASB
Subject: File Reference No. 1102-100

Dear Director,

I am writing in regard to the proposed rulings on stock option expensing. As an employee of Intel Corporation, I can attest to the positive benefits received from our program. Additionally, upon reviewing the arguments for and against expensing, it is apparent to me that there is not an accurate methodology identified for appropriately valuing the options. I can attest to the fact that had my options been valued at the time of granting, the projected value at that time would have been significantly different from what they are worth today. That causes me concern for my company's health given that it would have a direct impact on our bottom line which would be based upon inaccuracies.

As the rest of the world looks towards the usage of options to attract the best and brightest workforce, I fear we will find ourselves in a disadvantage; many US companies that currently provide options will be less likely to do so under the proposed guidelines given the inaccuracy found in reporting.

I highly recommend continuing the common practice of reporting in the footnotes the details about the options programs until a point in time that a methodology is developed that can appropriately forecast future value.

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