

Letter of Comment No: 120
File Reference: 1082-300
Date Received: 12-23-03

Stacey Sutay

Subject: FW: File Reference #1082-300

-----Original Message-----

From: EOroke@aol.com [mailto:EOroke@aol.com]

Sent: Tuesday, December 23, 2003 12:56 PM

To: Director - FASB

Subject: File Reference #1082-300

12/23/03

File Ref. # 1082-300

Dear FASB,

I am writing to express my concerns about the FIN 46 issue. I am a small business/franchise owner with 4 employees and \$250,000 in annual sales. My concern is that these new rules would add significant costs to my franchise business in these difficult economic times, and it is difficult to see the value the proposal brings to investors.

Not only would FIN 46 add a financial burden to my business, but it takes away my independence as a business person. For example, under FIN 46, I would be required to provide internal control reports to franchisor and adhere to the dictates of the franchisor's auditor. This would prevent me from making decisions that I believe are in the best interest of my business. Beings that my business success or failure hinges on decisions I make I think it is important that I am the one who controls my destiny.

These rules my be necessary and good for some business models, but not for franchising. Please consider changing these rules to make an exception for franchise businesses.

Sincerely,

Eric W. O'Roke, Lawn Doctor franchisee