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From: Jacques Frechet [jacques_frechet@symantec.com]
Sent: Thursday, June 24, 2004 3:22 PM
To: Director - FASB
Cc: arak@symantec.com
Subject: File Reference No. 1102-100

Hi!

I've decided to take this opportunity to express my support for the new accounting rules proposed by the FASB, in part because my employer appears to have repeatedly and strenuously encouraged me to write to you to express my opinion on the matter and to send a copy to our Director of Government Relations, which I'm happy to do. Please note that the personal opinions expressed here do not necessarily reflect those of my employer. In fact, although the new rules sound OK to me, I can't help but get the impression that many of my co-workers would strongly disagree with me, including some of those who have urged me to write. I appreciate their encouragement and their openmindedness.

I have been repeatedly warned that the proposed rule change would make employee stock purchase plans more expensive for companies to operate than they are now. I have no reason not to believe that my company would most likely get rid of its ESPP program entirely if the rules pass. Although no one has come out and said so, I can't help but come away with the strong impression that, since I'm currently enrolled in ESPP, some folks here are concerned on my behalf that this rule change is overwhelmingly likely to significantly reduce my personal income, which should scare me. I could easily have this wrong, but according to my cursory perusal of some advocacy web sites, the rule changes would supposedly have bad consequences for my employer and myself because, when my employer starts reporting the expense of the ESPP plan the new way, the stock market might suddenly decide that my employer's stock wasn't worth as much as they thought it was worth before – not because of any fundamental change in what my company actually does, but simply because of a change in the way information is presented to Wall Street about what my employer has been doing all along. I could be wrong, but I'm pretty sure my employer is already voluntarily reporting all of its ESPP expenses, as are many others. Surely the market must already have a clear idea of how much these plans cost, and would not be fooled when the new rules caused those same expenses to be reported in a different way.

This web site seems to argue that the new rules would actually decrease transparency. Am I to believe that the new rules would succeed in fooling the market and touch off widespread, unjustified panic? Maybe I'm being naive, but that just doesn't sound plausible to me. I guess you folks at the FASB must not think it's plausible either, and I'm sure you know a lot more about this stuff than I do.

I apologize if I've been spouting nonsense about matters beyond my comprehension. Though I am far from being a corporate accounting expert, I understand that you folks at the FASB are, in fact, experts, and if you think this change will make companies' financial statements more transparent, improve fairness, and increase trust in all publicly traded companies, then that sounds fine to me. Though I haven't been given any assurances, I nonetheless feel confident that if the new rules do go into effect, my employer will take the change in stride and will continue to provide adequate and fair compensation to all of its employees, even if that compensation takes a different form than it has in the past.

Thanks!

Jacques Frechet

6/24/2004