ELECTROCON INTERNATIONAL INC

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Robert H. Herz, Chairman **Director of Major Projects—File Reference No. 1102-100**Order Department, Financial Accounting Standards Board

401 Merritt 7, P.O. Box 5116

Norwalk, CT 06856-5116

Letter of Comment No: 3107 File Reference: 1102-100

Dear Chairman Herz:

Reality has set in for many businesses in this country. The economic situation for the past few years hasn't been the best, and many employers are looking for alternative ways to reward employees. That is why this latest move by the FASB to expense stock options upon delivery makes no sense to me. Why would any company want to go through the extra accounting headache of trying to figure out what the cost of the stock will be once an employee chooses to trade it in? It makes no sense.

The financial community has never been able to accurately predict the future. Yet the FASB, through its proposal for mandatory expensing, is asking them to start. My company doesn't own a crystal ball or a future machine---and I have no plans to actively seek either. By asking any company to do this, you put our financial futures on the line. It's not fair!

America is enduring a serious test of freedom from all corners. Let's not attack our own freedoms from within either. Please keep this stock expensing proposal from passing, and signal to all of us that you believe in small businesses. Thank you for your valuable time.

Sincerely,

Paul McGuire