Letter of Comment No: 1684 File Reference: 1102-100

Len Tatore

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To: Director - FASB

Subject: File Reference No. 1102-100

Sirs, I do not agree with your position of treating employee stock options as an accounting expense. This approach is counter to objective decision making. That is, employee options are not freely tradable, thus there is no objective market value providing a sound way to value these options. Also, employee stock options are subject to lengthy vesting periods—typically four or five years. If the employee changes jobs before the options vest, they are forfeited creating a company expense for an item that does not happen. Last, employee stock options will be exercised only if the stock price rises above the strike price. There is no certainty of future stock prices and thus that options will be exercised.

Please reconsider your approach.

Ken Kwidzinski Employee for Intel Corporation