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30 October 2003

Lawrence Smith

Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

RE: SFAS 150

Dear Mr. Smith:

It is my understanding that you are receiving letters of comment regarding standard 150 through the end of October 2003, and it is my hope that you will strongly consider revising or not implementing this standard. I am the President and CEO of a mid-sized architectural practice, headquartered in Houston. We are organized as a "C" corporation and have 9 shareholders.

Our shareholders' agreement requires mandatory buy out at age 65, and I understand that one of the provisions of standard 150 is that I will have to declare these buy outs as liabilities on our balance sheet. Since our shares are valued at book value, this provision would mean that we would always have a negative firm valuation.

The other provision of the standard that I am opposed to is the provision that we would have to recognize a loss each time shares are redeemed based on the difference in value between the share's valuation at the time of redemption and the amount originally paid for the share. Since much of the value of our shares is composed of "sweat equity" this provision has very negative consequences for us as well.

I realize that you are trying to thwart issues of fraudulent and/or misleading accounting practices, and I commend you for these efforts, but I must also strongly urge your careful review of the consequences of some of the standard's provisions when applied to small and medium sized private businesses.

Thanks for your consideration of my comments.

Cordially,

Chris A. Hudson, AIA
President and CEO