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Letter of Comment No: 4119
File Reference: 1102-100

From: Mark Barnes [barnema@sierrahealth.com]
Sent: Tuesday, June 15, 2004 8:19 AM
To: Director - FASB
Subject: Share-Based Payment Exposure Draft

Mark Barnes
5515 Erin Lee Ct.
North Las Vegas, NV 89031

June 15, 2004

Ms. Suzanne Bielstein
Financial Accounting Standards Board
401 Merrit 7
Norwalk, CT 06856-5116

Dear Ms. Bielstein:

Re: Share-Based Payment Exposure Draft

I work for a company that allows employees to purchase my employer's stock at a discount through an Employee Stock Purchase Plan (ESPP). I understand that the Financial Accounting Standards Board (FASB) has proposed a change to accounting standards that would require my company to count this discount as an expense against its earnings (Share-Based Payment exposure draft). I respectfully request that you reconsider this proposal and not require expensing of the discount allowed in ESPPs.

I am concerned that required expensing of the discount in the ESPP may make this valuable benefit plan less attractive to my employer, potentially causing my employer to either discontinue the plan, or reduce or eliminate the current discount. If the discount is greatly reduced or eliminated, buying company stock through the ESPP would no longer be much of a benefit. Unlike benefits aimed only at high-paid executives, this is a valuable benefit for employees across the company.

The ESPP is a very important benefit to me. Being able to participate in an ESPP has enabled me to invest in my financial future and experience a sense of ownership in my company. This benefit helped attract me to and serves as an incentive for me to remain with my employer. I could even say I continuously strive to perform to the best of my ability because I am an owner of the company.

Sierra Health allows employees an opportunity to purchase employer's stock, through the Employee Stock Purchase Plan (ESPP).

The new proposed changes in ESPP by the Financial Accounting Standards Board (FASB) will greatly effect our benefits for all the Sierra Health employees who participate in this program, also my family and I. Having an opportunity to purchase at a discounted rate will enable us to save for our future and our children's future.

This ESPP benefit we receive from Sierra is greatly needed: better education for our children, a down payment on a new home, or a better Christmas than usual. The ESPP program Sierra provides for us, I was able to put the needed down payment my home.

Please reconsider this proposed change on the ESPP.

Millions of workers like me in companies across the country are able to

purchase their employer's stock through ESPPs. This builds company loyalty and helps to promote high standards of work when employees have a sense of ownership.

I strongly urge FASB to consider the negative impact the proposed rule would have on the nearly 16 million workers like me and eliminate the expensing requirement for ESPP discounts in the final rule.

CC:
SEC, Chairman, William Donaldson
SEC, Chief Accountant, Donald Nicolaisen
Employee Ownership Coalition (eoc@vennstrategies.com)

Sincerely,

Mark Barnes