ikon Letter of Comment No:३५१३ File Reference: 1102-100

From: bobd@echelon.com

Sent: Thursday, May 13, 2004 4:47 PM

To: Director - FASB

Subject: File Reference No. 1102-100, Comment on FASB Stock Option Proposal



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Dear Mr. Robert Herz:

I am writing in reference to FASB's invitation to comment on its exposure draft, "Share-Based Payment," an amendment of Statements No. 123 and 95. I believe that options are correctly accounted for now, when they exercise. This is the only time when the value is well known. The valuation methods proposed by FASB simply do not work for long term options. Applying FASB proposed valuation methods to my company's outstanding, UNDERWATER options would produce a positive value to them, yet, they are valueless unless the underlying stock appreciates substantially before they expire.

Sincerely,

Robert Dolin 700 Wallea Drive Menlo Park, CA 94025