

International Union of Bricklayers and Allied Craftworkers

Office of the President June 4, 2004

> Director of Major Projects—File Reference 1102-100 Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116

> > File No. 1102-100 Re:

Dear Director:

On behalf of the over 100,000 participants and beneficiaries of the Bricklayers and Trowel Trades International Pension Fund, I welcome this opportunity to offer supporting comments on the Financial Accounting Standards Board's exposure draft regarding share-based payments, which calls for the expensing of all share-based payments awarded to employees. As a long-time proponent of the expensing of stock options, our Fund strongly supports FASB's proposed rules as a major step toward increased transparency.

Although there may be some disagreement as to the best method for valuing sharebased compensation, the principle underlying FASB's proposed rules is a simple truth: all corporate costs must be disclosed in order for our markets to properly function. We have long believed that shareholders cannot truly evaluate corporate performance without having a complete understanding of the costs incurred by corporations. Because stock options are a cost – just as surely as any other compensation paid to employees - corporations should be required to report awarded options as expenses on their income statements.

Access to accurate and transparent financial statements is critical to the investment decisions of all shareholders. No one is more aware of that fact than institutional shareholders such as our Fund. We therefore wish to once again applaud FASB's decision to support the expensing of share-based compensation, and we are confident that you will resist the obfuscations of the powerful special interests that wish to tamper with your sensible proposed rules.

Jo Hlynn

President

Letter of Comment No: 3609 File Reference: 1102-100