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Letter of Comment No: 2111 File Reference: 1102-100

From: Halter, Tom [tom.halter@intel.com]
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To: Director - FASB

Subject: File Reference No. 1102-100

I am very disappointed to learn that FASB is moving to require expensing of employee stock options. As a seven year veteran of Intel, I can assure you my options are very difficult thing to measure. While they have provided some benefits in the past, there is no guarantee that the options I have which vest in 4 or 5 years have any value. How do you value something that has no market? How do you put a price on something if it's not for sale? Will I still be at Intel in 4 years? All unknown questions to a complex problem. However, I do know that Intel employees want to work hard and be compensated if we succeed. Options provide the entrepreneurial drive to create future wealth, less government dependency, new markets, and new products.

It is ironic that a communist country is encouraging the wider use of stock options, while in the U.S. the FASB wishes to make option grants to employees much more difficult and expensive. This proposal will harm my ability to innovate and ultimately drive our nation towards second tier status.

Regards,

Tom

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