Capital Southwest Corporation

12900 Preston Road at LBJ Suite 700 Dallas, Texas 75230 972•233 8242 Fax 972•233-7362

William R. Thomas
President and Chairman

January 27, 2003

MP&T Director-File Reference 1102-001 Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116

Letter of Comment No: 236 File Reference: 1102-001 Date Received: /-7_7-03

Stock options have a value to the recipient and a cost to the issuer. Like payments of salary, their value should be expensed when they are granted and vested.

If the integrity and honesty of Corporate America and its accountants is to be restored, we must stop misleading shareholders and require immediate recognition of the significant expense of stock options.

Our Company (CSWC) is a publicly owned venture capital investment company. Those in the venture capital industry who oppose expensing options are determined to continue overstating the earnings of the money-losing companies which they and their larcenous investment bankers hope to keep dumping on the public.

President and Chairman