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From: Lesley Lawrence [Lesley.Lawrence@Sun.COM]
Sent: Tuesday, June 01, 2004 3:21 PM
To: Director - FASB
Subject: File Reference No. 1102-100: Letter of Opposition

Letter of Comment No: 2997
File Reference: 1102-100

Re: File Reference No. 1102-100: Letter of Opposition

I'm sending this letter to vehemently oppose FASB's proposal to mandate stock option expensing. Having been in the high tech industry for over 18 years (in non-executive capacities), I have personally witnessed the positive role of stock options in driving motivation, a sense of common ownership, and innovation in our industry. FASB's proposal would seriously impair all of the above, without any justification.

I am a single woman, and part of the baby boomer era. My personal ownership of stock in my company makes me part of a team, driven to improve, create and innovate in order to enhance stock prices. My stock options are: nontransferable; cannot be hedged; are long-term with typical vesting periods of four years and exercise periods of 10 years; generally forfeited if I leave the company or am terminated prior to vesting; and, most importantly, no market currently exists for trading employee stock options. Employee stock options are simply NOT an expense to a company.

Perhaps FASB is grasping at mandatory expensing to "punish" excessively compensated corporate executives. However, you are truly punishing the general employees at NON-executive levels through this proposal.

For those of us who are "baby-boomers," we know that we will be forced to work past the age of 65, depending on what remains of Social Security, (401)ks and IRA funds. Our economy won't fuel the golden year dreams of pensions and retirement funds. Therefore, many of us are driven to innovate and get our stock prices up, because our broad-based options may allow us to retire at some point, should we exercise our options. However, I only gain as an employee when the market increases...along with all other shareholders. Yet, FASB considers stock option grants a mandatory expense to corporations? And, FASB offers NO solid accounting model to determine stock option costs?

Please reconsider this proposal in its entirety.

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