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To: Director - FASB

Subject: File Reference No. 1102-100

I believe broad-based stock options plans foster innovation, a principle on which NASDAQ and our companies across all business sectors have been founded. Options have proven to be a valuable tool to increase

jobs and grow the U.S. economy. For example, options enable small companies to attract talent and grow, and help companies of all sizes to

better align the interests of their employees with the interests of their companies. FASB's plan has critical flaws, particularly in valuation models, and is more likely to confuse investors than clarify company finances.

Message points on stock options expensing:

Many see options expensing as an issue for only technology firms, but, in fact, companies across all industry sectors have successfully used options to attract talent and more closely align interests of employees with those of the companies.

Mandatory expensing will discourage use of options, thus discouraging entrepreneurship and business development.

More than an accounting issue, it is an economic issue that would have far-reaching negative consequences on many U.S. industries, hurting rank

and file workers, competitiveness and innovation.

FASB's plan will not improve corporate governance and will not help investors gain a complete understanding of a company's finances.

No valuation model for options (e.g. the Black-Scholes or lattice models)

is considered to be reliable, consistent or comparable.

Stock options are very different from market-traded options. It is impossible to create an accurate value, and expensing based on available

methodologies would in fact undermine the credibility of financial statements.

If companies are allowed to adopt FASB's different valuation models, inconsistent valuations and investor misinformation will be the result.

There are huge costs associated with implementing expensing 132749.jpg a

poor investment given the flaws inherent in the FASB plan 13277f.jpg which will negatively impact the accuracy and comparability of financial statements.

Respectfully,

Bahram Fotouhi, Ph. D.
Director of Engineering Advanced Products