As a middle manager at various high technology companies over the last 25 years, I have witnessed first hand the positive impact that stock options have had on employee performance and contribution, as well as on employees' personal financial security. Having grown up in a lower middle class family where my father's small pension was available to support my parents in retirement, I have serious concerns about many people's ability to retire comfortably, given the fact that pensions are much less common these days. Stock options have provided a way for employees to share in the success of the company while not burdening the company, or its shareholders, with escalating pension costs.

Forcing this extremely imprecise requirement of expensing future value just seems to be a much greater liability than a benefit. I foresee significant unintended consequences that will only surface after the damage is done. This is particularly true for smaller companies where early innovation is key. This change could undermine our economic competitiveness at a time when we can ill afford such a hindrance.

I sincerely hope that you carefully weigh this critical cost-benefit decision.

Bill Souders