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Letter of Comment No: 2992
File Reference: 1102-100

From: Carl Turner [Carl.Turner@Sun.COM]

Sent: Tuesday, June 01, 2004 4:09 PM

To: Director - FASB

Subject: File Reference No. 1102-100

To: Director of FASB
From: Carl Turner
RE: Letter of opposition to FASB stock option expensing mandate

I'm sending this letter in response to the FASB proposal to mandate stock option expensing. I am firmly opposed to this. I am a manager at Sun Microsystems and have recognized the incetive provided to me as an employee when stock options are available. Stock option expensing will likely drive even more of the high tech business to other countries. It could certainly be a differentiatior to those seeking employment where this may have been an option before, and reduce the incetive to produce well so that the company will do well, making the stock options a greater value.

I understand there is additional damage done to financial statemenst due to the inability to estimate the cost of options regardless of what model is used. It makes no sense to me that stock options would be considered an 'expense'. Is not the cost to the stockholders via stock dilution? IS there any means to 'true-up' an expense in later years?

I stronly urge you to reconsider your thinking on this issue.

Regards,

Carl Turner

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