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Letter of Comment No: 6180
File Reference: 1102-100

May 27, 2004

Robert H. Herz, Chairman
Order Department, Financial Accounting Standards Board
401 Merritt 7, P.O. Box 5116
Norwalk, CT 06856-5116

Director of Major Projects—File Reference No. 1102-100

Dear Chairman Herz:

As a member of the small business community, I am extremely concerned over the FASB's attempt to enforce mandatory expensing of stock options. That is why I am asking that you not allow the jobless economic recovery to lull you into a false sense of security that would make you agreeable to such a proposal. The market for highly-qualified, highly-skilled people is always a seller's market. A company's ability to offer employee stock option plans is an irreplaceable resource when it comes to landing their share of these sought-after recruits. They would be placed at a terrible recruiting disadvantage if they couldn't offer stock options.

As I am sure you are aware, more and more of the country's workforce plans for their own retirement and financial security and that is why the importance of stock options is rising for the everyday employee. However, if the FASB decides to use mandatory expensing, it could decimate these employee stock plans, thus making it even harder for the workforce to prepare for the future.

That is why I strongly urge you to support the needs and rights of small business owners. You can do this by opposing any mandatory expensing of stock options and let the business owners focus on running our businesses without unnecessary added reporting bureaucracy.

Sincerely,

Ken Ross

P.S. This is a huge issue for start-ups!