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Letter of Comment No: 2774 File Reference: 1102-100

From: Sent:

brian kirkland@silabs.com Monday, May 24, 2004 5:24 PM

Director - FASB

To: File Reference No. 1102-100, Comment on FASB Stock Upiloti Froposal Subject:



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Dear Mr. Robert Herz:

I am writing in reference to FASB's invitation to comment on its exposure draft, "Share-Based Payment," an amendment of Statements No. 123 and 95. I am one of the many engineers in this country that have reaped the benefits of stock options. Since I have a vested interest in seeing the program continued I want to voice my opinion that the new rules proposed by your group to treat stock options as an expense are not only fundamentally flawed, but will cause untold damage to U.S. technology companies and their employees.

I have read all of the positions of the Harvard economists who say that they are an expense and I could not disagree more. Instead of just re-iterating the position of those individuals who are against stock option expensing, I will just say that I support their positions wholeheartedly.

Restricted, non-public, vestable, employee stock options are NOT an expense to the company. The company cannot get even \$.01 for them on the open market, and no company should be forced to expense an item that has no inherant worth in an open market.

Please, for the sake of U.S. technological success, re-consider the proposed rules. Their implementation should never see the light of day.

Sincerely,

Brian Kirkland Silicon Laboratories 815 Elliott Ranch Rd Buda, TX 78610