

## ED2 Share-based Payment Comment Letters March 2003

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Comment Letter No	Company Name
1	Derek Strocher (Canada)
2	Julie Berndt
3	Douglas Jackson (USA)
4	Kenneth F. Broad (USA)
5	Robert Gillespie (USA)
6	David Norr Inc (USA)
7	National Centre for Employee Ownership (USA)
8	Nellen (UK)
9	Gary Waltz MD (USA)
10	Shyam Sunder (USA)
11	Intel Corporation (USA)
12	Council of Institutional Investors (USA)
13	National Australia Bank (Australia)
14	Fabless Semiconductor Association (USA)
15	Central Pension Fund of the International Union of Operating Engineers and Participating Employers (USA)
16	AFEP – AGREF (France)
17	Institute of Actuaries (Australia)
18	Telstra (Australia)
19	ServiceTec International Group Limited (UK)
20	Mind the GAAP (USA)
21	Group of 100 (Australia)
22	<b>[Confidential]</b>
23	Andrew H Dral (USA)
24	Pitcher Partners (Australia)
25	Tim Picks (USA)
26	Institute of Chartered Accountants of Zimbabwe (Zimbabwe)

27	Helmut Berndt (Germany)
28	The Japanese Institute of Certified Public Accountants
29	NSP Buck (Australia)
30	The Actuarial Profession (UK)
31	Spanish Accounting and Auditing Institute (ICAC) (Spain)
32	UK Share Scheme Lawyers Group (UK)
33	Raad voor de Jaarverslaggeving (Council for Annual Reporting) (Netherlands)
34	Pfizer (USA)
35	F. Hoffmann La-Roche (Switzerland)
36	Western Digital Corp. (USA)
37	Employment Policy Foundation (USA)
38	Jeremy Miles (UK)
39	The Jeffrey Company (USA)
40	Irish ProShare Association (Ireland)
41	Emap Plc (UK)
42	National Venture Capital Association (USA)
43	Frederic W. Cook & Co. (USA)
44	The Accounting Standards Executive Committee (AcSEC) of the American Institute of Certified Public Accountants
45	CPA Australia (Australia)
46	Infosys Technologies Limited (India)
47	Norsk RegnskapsStiftelse - Norwegian Accounting Standards Board (Norway)
48	Randstadd Holding NV (Netherlands)
49	Philips International B.V (Netherlands)
50	Australian Institute of Company Directors (Australia)
51	Föreningen Auktoriserade Revisorer (FAR) (Sweden)
52	British Bankers Association (UK)
53	Holcim Group Support Ltd (Switzerland)
54	Michael P. Bohan (USA)
55	AWG Plc (UK)

56	Watson Wyatt (UK)
57	Yorkshire Building Society (UK)
58	Clifford Chance LLP (UK)
59	New Bridge Street Consultants (UK)
60	Richard Tanner (South Africa)
61	Merck and Co Inc (USA)
62	Alcon Inc (Switzerland)
63	Apple Computer, Inc (USA)
64	Congress of the United States (USA)
65	Unitec Institute fo Technology (New Zealand)
66	Commonwealth Bank of Australia (Australia)
67	German Accounting Standards Committee (DRSC) (Germany)
68	Novartis International AG (Switzerland)
69	Treuhand Kammer (Switzerland)
70	Nippon Keidanren (Japanese Business Federation) (Japan)
71	Syngenta AG (Switzerland)
72	Accounting Standard Committee Thailand (Thailand)
73	BT Group (UK)
74	Hermes Pensions Management Ltd (UK)
75	Accounting Standards Board of Japan (Japan)
76	The Aarhus School of Business. (Denmark)
77	Tower Perrin's (UK)
78	Lancaster University (UK)
79	Microsoft Corporation (USA)
80	London Investment Banking Association (UK)
81	Telefonica S.A (Spain)
82	Christopher B. Waldorf (USA)
83	Swedish Shareholders' Association (SARF) (Sweden)
84	Ashurst Morris Crisp (UK)

85	Nokia Corporation
86	Investment Management Association (UK)
87	Lane Clark & Peacock LLP (UK)
88	Stagecoach Group Plc (UK)
89	Institute of Certified Public Accountants of Kenya (Kenya)
90	EICTA , The European ICT and Consumer Electronics Association (Belgium)
91	KPMG International
92	Industrie-Holding (Switzerland)
93	Institute of Chartered Accountants of Scotland (Scotland)
94	Accounting Standards Committee in Poland (Poland)
95	Institute of Certified Public Accountants in Ireland (Ireland)
96	<b>[Confidential]</b>
97	<i>JOINT RESPONSE</i> : Association pour la participation des entreprises françaises à l'harmonisation comptable internationale (ACTEO) And (MEDEF) (FRANCE)
98	UBS Warburg (UK)
99	Skandia Insurance Co. (Sweden)
100	WorldatWork (USA)
101	Association of Chartered Certified Accountants (ACCA) (UK)
102	Misys Plc (UK)
103	R.G Associates (USA)
104	Marsh & McLennan Companies (USA)
105 105A	Joint Response Société Générale (France) & BNP Paribas (France)
106	Grant Thornton Chartered Accountants (UK)
107	Shell International Limited (UK)
108	Xansa Plc (UK)
109	Electronic Industry Alliance (USA)
110	Queen's University Belfast (Northern Ireland)
111	Citigroup (USA)
112	Institute of Chartered Accountants in Ireland (Ireland)
113	Semiconductor Industry Association (USA)

114	The 100 Group of Finance Directors (UK)
115	Employee Share Ownership Centre (UK)
116	European Employee Stock Options Coalition
117	Forest Products Association of Canada (Canada)
118	Eli Lilly and Company (USA)
119	PricewaterhouseCoopers (UK)
120	Association for Financial Professionals (USA)
121	The Chamber of Auditors of the Czech Republic (Czech Republic)
122	Prof. Burton G. Malkiel & Prof William J. Baumol (USA)
123	Professor Richard Macve, FCA, Hon FIA (UK)
124	Cisco Systems (USA)
125	International Employee Stock Options Coalition
126	The International Organization of Securities Commissions (IOSCO)
127	Merrill Lynch (USA)
128	Prof. Norlin G. Rueschhoff (USA)
129	KLA Tencor (USA)
130	Applied Materials Inc (USA)
131	Institute of Certified Public Accountants in Israel (Israel)
132	Institute of Chartered Accountants of New Zealand (New Zealand)
133	Swiss Reinsurance Company (Switzerland)
134	Association of British Insurers (UK)
135	Proshare (UK)
136	EFRAG - European Financial Reporting Advisory Group
137	Foreningen af Statsautoriserede Revisorer (FSR) (Denmark)
138	Canadian Academic Accounting Association (Canada)
139	American Accounting Association (USA)
140	Johnson & Johnson (USA)
141	AstraZeneca Plc (UK)
142	Dell Computer Corporation (USA)
143	Australian Bankers Association (Australia)

144	National Association of Pension Funds (UK)
145	BP Plc (UK)
146	Hong Kong Society of Accountants (Hong Kong)
147	Conseil National de la Comptabilité (CNC) (France)
148	J. P. Morgan Chase (USA)
149	Unilever
150	Corporate Governance Advisor LLC
151	Pinsent Curtis Biddle (UK)
152	Leonard J. van der Heyden
153	Australian Accounting Standards Board (Australia)
154	South African Institute of Chartered Accountants (South Africa)
155	Canadian Accounting Standards Board (Canada)
156	Australian Venture Capital Association (Australia)
157	Deloitte Touche Tohmatsu International
158	Schroders UK
159	Quoted Companies Alliance (UK)
160	Council on Corporate Disclosure and Governance (CCDG)
161	International Accounting Standards Review Committee of the Korea Accounting Standards Board (KASB) <i>Korea</i>
162	Basel Committee on Banking Supervision <i>Switzerland</i>
163	Swedish Financial Accounting Standards Council <i>Sweden</i>
164	Confederation of British Industry CBI (UK)
165	Xilinx Inc (Ireland)
166	Institut der Wirtschaftsprüfer (IDW) (Germany)
167	GKN Plc (UK)
168	Ernst & Young Global Limited
169	Teachers Pension Plan (Canada)
170	John Quiggin (Australia)
171	Robert W Glenn (US)
172	Rudy Van der Maat (Australia)

173	Alphameric Plc (UK)
174	Armour Group Plc (UK)
175	Moody's Investor Service (USA)
176	Munchener Ruckversicherungs-Gesellschaft (Germany)
177	Tredge Ap-fonden (Sweden)
178	Mercer (UK)
179	Christian Strenger (Germany)
180	Old Mutual (UK)
181	Association Nationale des Sociétés par Actions (France)
182	RWE Aktiengesellschaft (Germany)
183	Teachers Insurance and Annuity Association College Terirement Equities Fund (USA)
184	Helsinki School of Economics (Finland)
185	UBS AG (Switzerland)
186	Cardinal Health (USA)
187	Aktiespararna (Sweden)
188	International Association of Financial Executives Institutes (IAFEI)
189	<b>Confidential]</b>
190	Nestlé S.A (Switzerland)
191	International Corporate Governance Network (UK)
192	Railpen Investments (UK)
193	Canadian Coalition for Good Governance (Canada)
194	Joint Response: Financial Executives International and the Institute of Management Accountants
195	Fédération des Experts Comptables Européens (FEE) (Belgium)
196	Hewitt Bacon & Woodrow (UK)
197	GlaxoSmithKline (UK)
198	Murray G. Johnston
199	Chartered Institute of Management Accountants (CIMA)
200	London Society of Chartered Accountants (LSCA) UK
201	Institute of Chartered Accountants in England and Wales (UK)

202	Malaysian Accounting Standards Board (Malaysia)
203	Swisscom Ltd (Switzerland)
204	Allianz Group (Germany)
205	Association for Investment Management and Research (AIMR)
206	The Law Society (UK)
207	Detica Group Plc
208	Abcam Ltd
209	Association of Corporate Treasurers
210	Allied Irish Bank (Ireland)
211	Pensions Investment Research Consultants Ltd. (PIRC)
212	Debenhams Plc
213	Countrywide Assured Group
214	Fuller Smith & Turner Plc
215	The Chartered Institute of Public Finance and Accountancy
216	Robert Walters Plc
217	Addleshaw Booth & Co
218	Kudos Pharmaceuticals Ltd
219	R D McDougall Management Consultants
220	British Airways
221	NW Brown Employee Benefits Ltd <b>{Confidential}</b>
222	Holiday Break PLc
223	John Gledhill
224	Paradigm Therapeutics Ltd
225	<b>NUMBER NOT USED – DUPLICATE CL</b>
226	Smith & Williamson Limited
227	Marks and Spencer's Plc
228	British American Tobacco
229	Eversheds
230	Aviva Plc
231	David Creed



232	Tate & Lyle Plc
233	Andrew Given
234	MSB International Plc
235	Pearson Plc
236	BG Group
237	Securities Commission (New Zealand)
238	Accounting Standards Board (ASB) (UK)
239	ICT Ireland (Ireland)
240	William H Scott, Jr. (USA)
241	Securities Institute of Australia (Australia)
242	GRH Plc (Ireland)
243	Hills Industries Limited (Australia)
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