FAS 123R Implementation Survey 2010

1) What valuation model do you plan to use in FY 2010?

- a) Have you created a footnote disclosure statement explaining your choice of valuation technique?
- b) Do you believe that Statement 123R Paragraph A87 provides an accurate Fair Value calculation using the Lattice model?
- c) When is the use of Monte Carlo Simulation method preferred?
- d) Will you use a single risk-free interest rate or a series of implied forward rates?

2) Do you have any questions about SEC Staff Accounting Bulletin 107?

a) Will you use the SAB 107 simplified Expected Term formula in FY 2010?

3) Do you have any questions about PCAOB Staff Audit Guidelines?

a) Are you prepared to answer questions from your independent auditor regarding model selection and the reasonableness of assumptions used?

4) How will you estimate Expected Volatility?

- a) How would you adjust historical volatility to deemphasize periods of unique activity?
- b) Are you blending implied and historical volatilities to estimate Expected Volatility?
- c) How do you determine your peer group companies?

5) How will you substantiate your estimate of Expected Term?

- a) Are you going to use the SAB 107 transition simplified formula in FY 2010?
- b) What is the difference between average time to exercise and average time outstanding?
- c) What percentage of options typically expire without exercise?
- d) What is your Expected Forfeiture (post-vest) assumption for FY 2009 grants?

6) How will you estimate Expected Forfeitures?

- a) Will you use historical pre-vest forfeiture data?
- b) Will you assume an estimated future turnover rate applied to each tranche?
- c) How often do you revise your estimate of pre-vest forfeiture rates?

7) What is your Suboptimal Exercise Factor ("SOEF") assumption?

- a) Are you familiar with 123R Paragraph A87 Illustration 4 that assumes an SOEF of 2.0?
- b) How will you estimate SOEF in future reporting periods?

8) Do you plan to grant Market Condition awards?

- a) How will you calculate the Fair Value of these awards?
- b) How will you calculate Duration or Derived Service Period?

9) Do you plan to grant Performance Condition awards?

a) How will you calculate probability of Exercise?

10) How many ESO awards are planned for FY 2010 or were granted in FY 2009?

- a) What level of precision do you plan to apply in calculating the Fair Value of these awards?
- b) What is the materiality of applying an advanced valuation technique vs. an approximation method?

11) What feedback have you received during FY 2009 from your independent auditor or financial advisor regarding interpretation and implementation of FAS 123R?

a) Montgomery Investment Technology offers three 123R solutions: Software Applications, CPE Approved Training, and Valuation Consulting Services.

