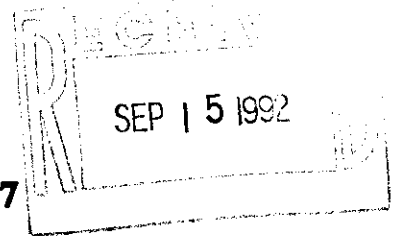


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STANCO METAL PRODUCTS, INC.
P.O. BOX 307
GRAND HAVEN, MICHIGAN 49417-0307



September 16, 1992

Top Hat Plan Exemption
Pension & Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

Stanco Metal Products, Inc. Pension Plan

Ladies and Gentlemen:

We maintain a non-qualified deferred compensation plan for a select group of our management employees. This letter is intended to comply with the requirements of DOL Regulations §2520.104-23 concerning an alternate method of compliance with the reporting and disclosure requirements of Part I of Title I of ERISA.

The information required by the regulation is as follows:

1. The name, address and employer ID number of the employer are as follows:

Stanco Metal Products, Inc.
P.O. Box 307
2101 - 168th Avenue
Grand Haven, Michigan 49417-0307

(616) 842-5000

EIN NO. 38-0915585

Top Hat Plan Exemption
September 16, 1992
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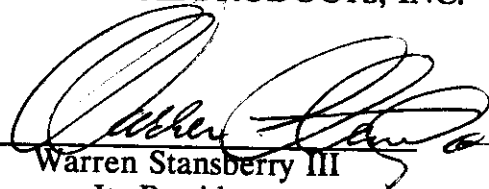
2. The employer maintains a plan for the purpose of providing deferred compensation for a select group of management employees;
3. The employer maintains only one such plan;
4. The plan covers 11 retirees and one employee who is on a medical leave of absence from employment as of the date of this letter
5. The employer will provide copies of plan documents to the Secretary of Labor upon request.

This plan has been in existence since before 1975. This statement is being filed with the Department in accordance with the amnesty program announced by the Department in News Release 92-158 and the Notice issued on July 20, 1992 as a clarification of the program for "top hat" plans. We are filing a copy of this letter with the Pension & Welfare Benefits Administration along with our check in the amount of \$1,000 to cover the penalty for the late filing of this statement.

Very truly yours,

STANCO METAL PRODUCTS, INC.

By



Warren Stansberry III
Its President

LJT/rak

cc: U.S. Department of Labor
Pension & Welfare Benefits Administration
P. O. Box 75212
Washington, DC 20013-5212