

U.S. DEPARTMENT OF LABOR
 DIVISION OF PUBLIC DISCLOSURE
 July 19, 2002

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VIA CERTIFIED MAIL
 RETURN RECEIPT REQUESTED

2520032900324

Timothy J. Windle
 Vice President &
 General Counsel

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

Re: Top-Hat Filing Notice

Dear Sir or Madam:

APL Limited has adopted the 2002 APL Deferred Compensation Plan (the "Plan"), which is maintained primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. This statement, including the information set forth below as follows, is being filed pursuant to Department of Labor Regulation Section 2520.104-23:

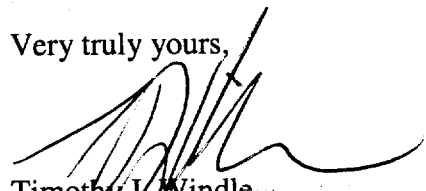
1. Employer Name: APL Limited
2. Employer's EIN: 94-2911022
3. Employer's Address: 1111 Broadway, 5th Floor
Oakland, CA 94607-5500

4. Number of Employees Participating:

Number of employees of APL Limited participating:	22
Number of employees of APL Logistics Americas, Ltd. participating:	6
Total number of employees participating:	28

APL Limited will provide the Plan document to the Secretary of Labor upon request.

Very truly yours,


 Timothy J. Windle
 On behalf of the Plan Administrator

APL Limited
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