

July 19, 2002

VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

2520032900325



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 Logistics Americas, Ltd. 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 Logistics Americas, Ltd.                                   |    |
| 2. | Employer's EIN:  | 94-3017941   |    |
| 3. | Employer's Address:  | 1111 Broadway, 5 <sup>th</sup> Floor<br>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 Logistics Americas, Ltd. will provide the Plan document to the Secretary of Labor upon request.

Very truly yours,

Timothy J. Windle  
 On behalf of the Plan Administrator



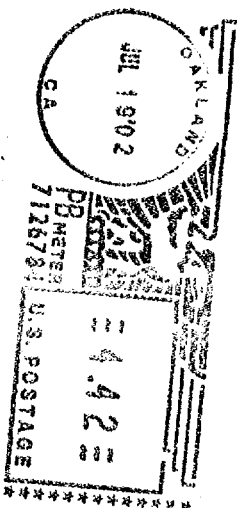
APL Limited  
1111 Broadway  
Oakland, CA 94607-55  
USA

**CERTIFIED**

P 530 558 708

**MAIL**

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**NOL GROUP**

