



U.S. DEPT. OF LABOR
PNSA/PUBL. AFF. DIV.
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DISCLOSURE

P. O. Box 3546 • Seattle, Washington 98124 • Telephone: (206) 623-5800

May 15, 2002

2520032901255

Certified Mail/Return Receipt Requested

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

**RE: Alternative Reporting and Disclosure Statement
for "Top Hat" plan**

Dear Madam or Sir:

Alaskan Copper Companies, Inc. hereby submits the following information pursuant to Department of Labor regulations 29 CFR §2520.104-23, in accordance with the alternative method complying with ERISA's reporting and disclosure requirements for top hat plans:

Name of Employer: Alaskan Copper Companies, Inc.

Address of Employer: PO Box 3546, Seattle, WA 98124-3546

Employer Identification Number: 91-1738827

Declaration of Employer: Alaskan Copper Companies, Inc. maintains the following plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

Name of Plan: Supplemental Retirement and Death Benefit Plan for Executives of Alaskan Copper Companies, Inc.

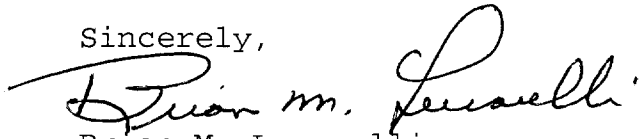
Number of Participants: 7 Employees

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The plan documents will be provided upon request. Please contact me if you have any questions or need additional information.

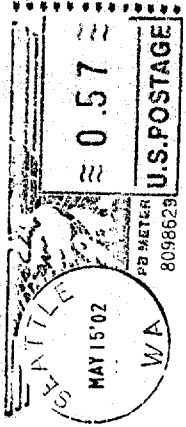
Also enclosed is a photocopy of this letter. I would appreciate it if your office would stamp the photocopy of this letter as to date and time of receipt, then return it to me in the enclosed self-addressed envelope.

Sincerely,

A handwritten signature in cursive script that reads "Brian M. Lucarelli". The signature is written in dark ink and is positioned above the printed name.

Brian M. Lucarelli
CFO & Asst. Secretary

cc: Thomas Owendale
Alan L. Montgomery



12/22

TOP HAT PLAN EXEMPTION
PENSION + WELFARE BENEFITS ADMINISTRATION
ROOM N-5644
U.S. DEPT. OF LABOR
200 CONSTITUTION AVE N.W.
WASHINGTON, DC 20210