

March 4, 2002

VIA CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

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

2520032903025

U.S. DEPT. OF LABOR
200 CONSTITUTION AVENUE, N.W.
WASHINGTON, D.C. 20540
02 MAR 18 PM 2:10

**RE: Top Hat Plan Exemption
Belk, Inc.
2801 West Tyvola Road
Charlotte, NC 28217
EIN: 56-0616731**

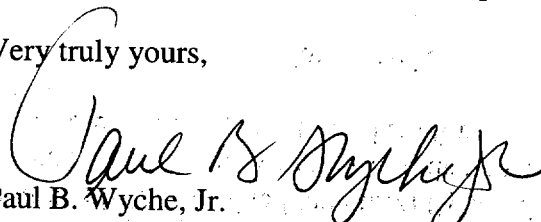
Dear Sir or Madam:

We are submitting this letter to inform you (in accordance with DOL Reg. 2520.104-23) that on Belk, Inc. ("Belk") adopted the Belk Deferred Compensation Plan V (the "Plan"), effective January 1, 2002. The plan is designed primarily for the purpose of providing deferred compensation for a select group of the management or highly compensated employees of Belk, Inc. and its affiliates. The Plan currently has 51 participants, and the number of participants in the Plan may increase or decrease in the future. Belk and its affiliates have 4 other deferred compensation plans for management or highly compensated employees as follows:

Plan	Number of Participants as of March 4, 2002
Belk Stores Services Deferred Compensation Plan I	138
Belk Stores Services Deferred Compensation Plan II	144
Belk Stores Services Deferred Compensation Plan III	87
Belk Stores Services Deferred Compensation Plan IV	76

Belk, Inc. will provide a copy of the Plan to the Secretary of Labor upon request.

Very truly yours,



Paul B. Wyche, Jr.
Sr. Vice President/Associate Counsel
Belk, Inc.

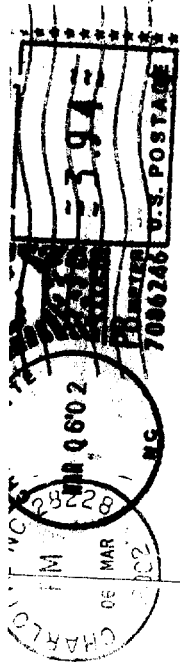
Charlotte, N.C. 28217-4500

2659 EE40 9000 0T52 T002



CERTIFIED MAIL

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE



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Washington, DC 20210

