



AMERICA'S OLDEST MAIL ORDER COMPANY
A SPORTING TRADITION SINCE 1856

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December 23, 1992

United States Department of Labor
Pension & Welfare Benefits Administration
Box 75212
Washington, DC 20013-5212

Dear Sir or Madam:

Re: Deferred Compensation Plan of The Orvis Company, Inc.
(the "Plan")

19,049

The Orvis Company, Inc. (the "Company") maintains an unfunded pension plan for a select group of highly compensated/management employees eligible for the alternative method of compliance described in Department of Labor Regulation #2520.104-23. Pursuant to the Notice published by the U.S. Department of Labor in the July 24, 1992 addition of the Federal Register, Volume 57, Number 143, Page 33019, the Company, which is the administrator of the Plan hereby files the following statement with the Secretary of Labor:

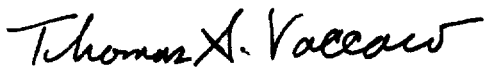
1. Name and Address of Employer: The Orvis Company, Inc., 10 River Road, Manchester, Vermont 05254.
2. Employer Identification Number assigned by the Internal Revenue Service: 03-0215459.
3. The Company maintains The Orvis Company, Inc. Deferred Compensation Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
4. Number of plans covered by this statement: One.
5. Number of employees participating in the Plan: 7

6. Plan documents are available upon request. Requests for copies of such documents should be addressed to the undersigned at the address on this letterhead.

Enclosed is a check payable to the U.S. Department of Labor in the amount of \$1,000 as the appropriate civil penalty as required in the above described Notice in the Federal Register.

If you require anything further, please do not hesitate to contact the undersigned.

Very truly yours,



Thomas S. Vaccaro
Vice President of Finance

TSV/vf
enclosure

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