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February 19, 1999

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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

Re: The Deferred Capital Account Program

Dear Sir:

Pursuant to the provisions of Department of Labor Regulation § 2520.104-23, you are hereby notified that Cable & Wireless Holdings, Inc. maintains the above-referenced Plan primarily for the purpose of providing deferred compensation to a select group of management or highly compensated employees. The name, address and identification number of the employer are:

Cable & Wireless Holdings, Inc.  
8219 Leesburg Pike  
Vienna, VA 22182-3964  
Identification Number: 13-2922204

The Plan has 1 participant.

Please acknowledge receipt of this letter by stamping and returning to me on behalf of the employer the copy of the letter enclosed herewith for acknowledgment purposes. A stamped, self-addressed envelope is enclosed for your convenience.

Sincerely,

A handwritten signature in cursive script, appearing to read "Arthur H. Kohn".

Arthur H. Kohn

Enclosure