

January 15, 1996

2520040184104



Secretary of Labor  
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: Alternative Method of Compliance under DOL Reg. Section 2520.104-23

Dear Sir or Madam:

The purpose of this letter is to (i) notify the Department of Labor that Mueller Industries, Inc., a Delaware corporation, recently established a deferred compensation plan, and (ii) comply with the "Alternative Method of Compliance" for reporting and disclosure (as set forth in DOL Reg. Section 2520.104-23) with respect to those plans.

In accordance with that Section, we provide you with the following:

1. Name and Address of Employer.

Mueller Industries, Inc.  
8001 Centerview Parkway, Suite 103  
Cordova, TN 38018

Mueller Refrigeration Products Co, Inc.  
121 Rodgers Street  
Hartsville, TN 37074

Mueller Industries, Inc.  
2959 N. Rock Road  
Wichita, KS 67226

Mueller Brass Company  
2199 Lapeer Avenue  
Port Huron, MI 48060

Mueller Copper Tube Co, Inc.  
Route 25 South  
Fulton, MS 38843

2. Employer Identification No.

#48-1100985  
#48-1100990

#25-0790410  
#48-1100984

#48-1100981

3. Declaration

The Employer established on January 1, 1996, the Deferred Compensation Plan. The Employer now maintains **one non-qualified deferral plan** which is maintained primarily for the purpose of providing deferred compensation for a select group of management and highly compensated employees or Directors. **The number of executives and Directors that participate in the plan is 13.**

4. Documents

With respect to the plan described above, the employer will provide to the Secretary of Labor, upon its request, copies of the plan document(s), if any, that are required by Section 104 (a) (1) of the Employee Retirement Income Security Act of 1974 to be filed with the Secretary of Labor.

Enclosed is a copy of this letter, which we ask that you date-stamp and return to us in the enclosed self-addressed and stamped envelope.

If you should have any questions about this letter, please do not hesitate to contact us at the above address.

Sincerely,

Lowell J. Hill  
Vice President, Human Resources  
Mueller Industries, Inc.

901-753-3204

cc. Compensation Resource Group, Inc.