



Woodward  
Communications,  
Inc. P.O. Box 688, Dubuque, Iowa 52001 (319) 588-5687

2520042394037

June 2, 1999

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

To Whom It May Concern:

Pursuant to Labor Regulation Section 2520.104-23, we are submitting this statement as an alternative method of compliance for pension plans with certain selected employees. In support of this statement, we make the following representations.

Name, Address and EIN of the Employer

Woodward Communications, Inc.  
801 Bluff Street  
Dubuque, Iowa 52001  
EIN: 42-0559640

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Declaration

Woodward Communications, Inc. maintains a plan (Woodward Communications, Inc. Excess Benefit Phantom Stock Plan - Trongaard) for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The plan is maintained for one employee.

If you have any questions or would like more information regarding the plan, please call me at 319-588-5698.

Sincerely,

Woodward Communications, Inc.  
William Skemp, Vice Chairman



William Skemp, Vice Chairman

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