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WRITER'S DIRECT NUMBER  
 (215) 981-4856

December 19, 1997

**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

69 981-4856

**Re: Columbian Mutual Life Insurance Company Top Hat Plans**

Ladies and Gentlemen:

The board of directors of Columbian Mutual Life Insurance Company has adopted several arrangements primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The following information concerning those arrangements is provided on behalf of Columbian Mutual Life Insurance Company pursuant to Department of Labor Regulation §2520.104-23:

1. Name of Employer:

Columbian Mutual Life Insurance Company

2. Address of Employer:

Jack R. Manning Plaza  
 Vestal Parkway East  
 P.O. Box 1381  
 Binghamton, NY 13902-1381

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3. Employer's Tax Identification Number:  
15-0274455
  
4. Plans Maintained:
  - a. Columbian Mutual Life Insurance Company Deferred Compensation Plan (the "Deferred Compensation Plan")
  - b. Columbian Mutual Life Insurance Company Long Term Incentive Plan (the "LTIP")
  - c. Columbian Mutual Life Insurance Company Supplemental Executive Retirement Plan (the "SERP")
  
5. Number of Employees Participating in Each Plan:
  - a. Deferred Compensation Plan - 2
  - b. LTIP - 5
  - c. SERP - 6

If you require additional information, please contact the undersigned at the letterhead address.

Sincerely,



Joel E. Horowitz

cc: Ms. Robin Brown