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Newell Coach Corp.

Karl Blade
President

November 1, 1993


Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
United States Department of Labor
200 Constitution Avenue N.W.
Washington, D. C. 20010

Re: Notification Required by 29 CFR § 2529,194-23
Newell Coach Corporation
EIN 73-1080966

Dear Sir or Madam:

Newell Coach Corporation, EIN 73-1080966, located at P. O. Box 511, Miami, Oklahoma 74355, hereby declares that it maintains an unfunded deferred compensation plan for a select group of management or highly compensated employees, known as the Newell Coach Corporation Phantom Stock Plan, which was adopted on July 1, 1993. One employee currently participates in the Plan. The Plan is maintained primarily for the purpose of providing deferred compensation for a select group of management and highly compensated employees. Copies of plan documents are available upon request.

Sincerely,


Karl Blade
President

KB/mg