

DORSEY & WHITNEY LLP

MINNEAPOLIS
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 LONDON
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 DES MOINES
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 COSTA MESA

PILLSBURY CENTER SOUTH
 220 SOUTH SIXTH STREET
 MINNEAPOLIS, MINNESOTA 55402-1498
 TELEPHONE: (612) 340-2600
 FAX: (612) 340-2868

DON D. CARLSON
 (612) 340-2894
 Fax (612) 340-7800
 carlson.don@dorseylaw.com

NEW YORK
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December 15, 1998

CERTIFIED MAIL

Return Receipt Requested
Receipt No: Z 208 134 592

To: Top Hat Exemption
 Pension and Welfare Benefits Administration
 Room N-5638, U.S. Department of Labor
 200 Constitution Avenue NW
 Washington, D.C. 20210

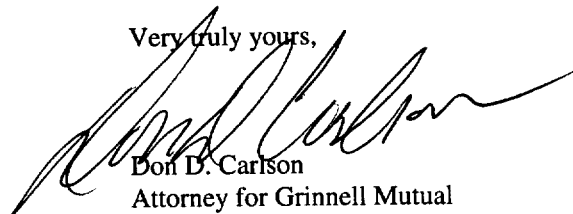
Re: Top Hat Plan Exemption

This letter constitutes a filing under 20 C.F.R. § 22520.104-23 on behalf of Grinnell Mutual Reinsurance Company (EIN: 42-0245990). Grinnell Mutual Reinsurance Company maintains four (4) employee benefit plans which are primarily for the purpose of providing deferred compensation to a select group of management or highly compensated employees. The plans are as follows:

1. Grinnell Mutual Reinsurance Company Nonqualified Supplemental Executive Retirement Plan: 6 participants.
2. Excess Benefit Plan: 13 participants.
3. Grinnell Mutual Reinsurance Company Executive Deferred Compensation Plan: 16 participants.
4. Grinnell Mutual Reinsurance Company Officers' Supplemental Retirement Plan: 13 participants.

If you need any additional information, please call or write to me.

Very truly yours,



Don D. Carlson
 Attorney for Grinnell Mutual
 Reinsurance Company

DDC/MLW/kad

cc: Dennis G. Day