

Graham & Graham

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December 30, 1993

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

2520032033013

Re: Muskingum Iron & Metal Co. Non-Qualified Deferred
Compensation Plan
Federal ID: 31-0729048

Dear Sir or Madam:

Pursuant to Regulation 2520.104-23(c), we are providing you with the Alternative Method of Compliance for Pension Plans for our client Muskingum Iron & Metal Co., which has created effective December 27, 1993, a Non-Qualified Deferred Compensation Agreement for Arthur L. Joseph. This Plan is eligible for an alternative form of compliance notification by virtue of Regulation Section 2520.104-23(d)(1) and Regulation Section 2520.104-44(b)(1).

Please advise if additional documentation is needed.

Very truly yours,



Brent A. Stubbins
Attorney at Law

BAS/jt
Encs.

ALTERNATIVE METHOD OF COMPLIANCE STATEMENT

MUSKINGUM IRON & METAL CO., Deferred Compensation Plan

Name and Address of Plan: MUSKINGUM IRON & METAL CO.,
Deferred Compensation Plan
P. O. Box 4616
345 Arthur Street
Zanesville, OH 43702-4616

Sponsoring Employer and
Federal Employer ID No. 31-0729048

Number of Plans: One

Number of Participants as
of December 27, 1993: One

Muskingum Iron & Metal Co. declares that its intent is to maintain a deferred compensation plan primarily for the purpose of providing deferred compensation for a highly-compensated management employee.