



2520043385162

January 14, 2005

Top Hat Plan Exemption
Employee Benefits Security Administration
Room N-1513
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Enclosed is the Disclosure for the Top Hat Plan Exemption for First Command Financial Planning, Inc., as required by the Department of Labor, Regulation Section 2520.104-23.

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael F. Morrison', written over a horizontal line.

Michael F. Morrison
Director, Financial Services

/skr

Enclosure

January 14, 2004

VIA CERTIFIED MAIL

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Gentlemen or Ladies:

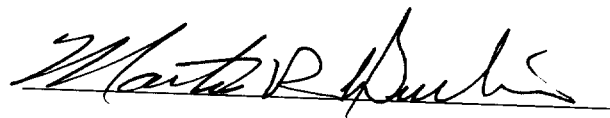
In accordance with Department of Labor Regulation Sec. 2520.104-23, First Command Financial Planning, Inc., located at First Command Financial Planning, Inc. Building, 4100 Hulen Street, Fort Worth, TX 76109, and assigned EIN No. 75-1054341 by the Internal Revenue Service, hereby declares that it maintains one (1) unfunded plan which is established for a select group of management or highly compensated employees. The number of employees currently covered under the plan is as follows:

<u>Plan Name</u>	<u># of Participants</u>
First Command Financial Planning, Inc. Senior Key Employee Retention Plan	seven

Copies of the plan document for the above plan will be provided to the Secretary of the Department of Labor upon request as required by section 104(a)(1) of the Employee Retirement Income Security Act of 1974, as amended.

The filing of this statement is intended solely to comply with Reg. Sec. 2520.104-23 to the extent it applies, and may not, by itself, be treated as an admission by First Command Financial Planning, Inc. that the arrangements described herein are "employee pension benefit plans" subject to the Employee Retirement Income Security Act of 1974, as amended.

Respectfully submitted,



Martin R. Durbin
Chief Financial Officer



PO Box 2387
Fort Worth, TX 76113-2387
Address Service Requested

CERTIFIED MAIL



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