

777 108th Avenue N.E.  
Suite 2390  
Bellevue, WA  
98004  
(206) 462-6000



November 20, 1990

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

In compliance with the requirements of the alternative method of reporting and disclosure under Part 1 of Title I of the Employee Retirement Income Security Act of 1974 and for unfunded pension plans maintained by an employer for a select group of management or highly compensated employees, specified in Department of Labor Regulations, 29 CFR §2520.104-23, the following information is provided by the undersigned employer.

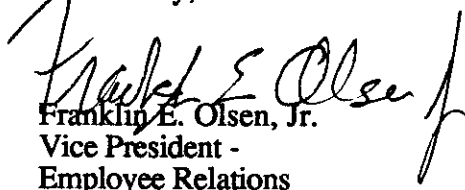
Name and Address of Employer:           PENWEST  
777 108th Avenue N.E.  
Suite 2390  
Bellevue, WA 98004

Employer Identification Number:       93-0256820

PENWEST, LTD. has implemented the following plans effective September 1, 1989, signed on November 20, 1990:

Plan	Number of Employee Participants
Deferred Compensation Plan	8
Supplemental Executive Retirement Plan	4
Supplemental Survivor Benefit Plan	4
Supplemental Disability Income Plan	20

Yours truly,

  
Franklin E. Olsen, Jr.  
Vice President -  
Employee Relations