

U.S. DEPT. OF LABOR  
PUBLIC DISCLOSURE  
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January 1, 2001

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

**Re: Rockingham Mutual Insurance Company Supplemental Executive Retirement Plan**

Dear Secretary:

Pursuant to Section 2520.104-23 of the Department of Labor's Regulations, this letter will serve as notice that, with respect to Rockingham Mutual Insurance Company Supplemental Executive Retirement Plan (the "Plan"), the undersigned intends to use the alternative form of compliance with the reporting and disclosure requirements of Part 1 of Title 1 of the Employee Retirement Income Security Act of 1974 (ERISA), which alternative form of compliance is provided in the aforesaid Regulations Section.

Pursuant to Regulations Section 2520.104-23(b), the following information is provided:

**Name and Address of Employer:** Rockingham Mutual Insurance Company  
633 East Market Street  
Harrisonburg, VA 22801-4294

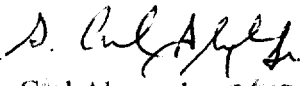
**Employer's Employer Identification Number:** 54-0837857

The Employer hereby declares that it maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

The Employer hereby states that it maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

Pursuant to Regulations Section 2520.104-23(b)(2), the Employer will provide Plan documents, if any to the Secretary of Labor upon request as required by Section 104(a)(1) of ERISA.

Very truly yours,

  
S. Carl Alexander, Jr., Secretary  
Rockingham Mutual Insurance Company

