

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

From: Employer: Mitsubishi Heavy Industries America, Inc.

Employer Identification Number: 36-3031033

Address: 630 Fifth Avenue, Suite 3155, NY, NY 10111

Date: November 3, 1999

This document constitutes the statement required by Department of Labor Regulation 2520.104-23 to be filed with the Secretary of Labor in respect to Non-qualified Deferred Compensation Plans maintained by the above employer.

The employer currently maintains one Non-qualified Deferred Compensation Plan for executives who are members of a select group of management or who are highly compensated.

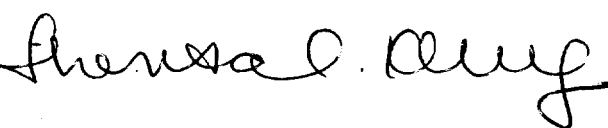
The number of participants in each plan is as follows:

Plan 1 1

1/1

Signed

Plan Administrator.



Title: Director, Human Resources of

Employer: Mitsubishi Heavy Industries America, Inc.

