

STANDARD-SOUTHERN CORPORATION

June 21, 2001

U.S. DEPT. OF LABOR
EMLA/PUBLIC DISCLOSURE
01 JUL -5 AM 11:24

Certified Mail No. 7000 0600 0022 6410 3735
Return Receipt Requested

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

RE: Standard-Southern Corporation Supplemental Executive Retirement Plan

Dear Sir or Madam:

In accordance with the Department of Labor Regulation §2520.104-23, this letter will serve as the alternative method of compliance with the reporting and disclosure requirements of Part I of Title I of the Employee Retirement Income Security Act of 1974, as amended, for a pension plan for a select group of management or highly compensated employees.

1. The name and address of the employer is Standard-Southern Corporation, 4211 S.W. Freeway, Suite 200, Houston, Texas 77027.
2. The employer identification number assigned by the Internal Revenue Service to the employer is 74-0918699.
3. The employer declares that it maintains this Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
4. The number of employees in this Plan is 1.

Very truly yours,



Gerald Rauch, President

