



The Boler Company.

August 16, 1999

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

Dear Madam or Sir:

This letter is intended as an alternative method of compliance with the reporting and disclosure requirements of Part 1 of Title I of ERISA pursuant to 29 C.F.R. Sec. 2520.104-23. The information contained herein is an update of the information provided to you on August 28 and December 22, 1992, and April 1, 1993, based on changes made since those dates.

The following employer currently maintains six (6) unfunded plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees, three (3) (one (1) of which inadvertently was not listed in any of the three letters identified above) of which each cover one (1) employee; one (1) of which covers two (2) employees; one (1) of which covers sixteen (16) employees; and one (1) of which covers forty-one (41) individuals, thirty-three (33) of whom are employees of the employer and eight (8) of whom are employees of foreign corporation subsidiaries or affiliates of the employer:

The Boler Company.
500 Park Boulevard, Suite 1010
Itasca, Illinois 60143-1285
EIN 36-2928548

Very truly yours,
THE BOLER COMPANY.

John M. Gaynor
Treasurer

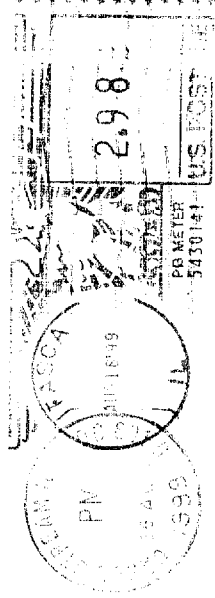
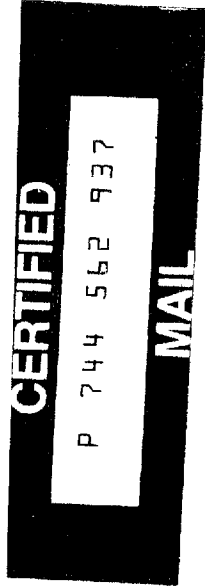
JMG:dk

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