



U.S. DEPARTMENT OF LABOR
ADMINISTRATIVE SERVICES CENTER

American Chemical Society

Human Resources

1155 SIXTEENTH STREET, N.W.
WASHINGTON, D.C. 20036

October 10, 2006

Secretary of Labor
Top Hat Plan Exemption
Employee Benefits Security Administration
Room N-1513
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, D.C. 20210

06 OCT 16 PM 3:58

Re: American Chemical Society 457(b) Deferred Compensation Plan

Dear Secretary:

Under Section 2520.104-23 of your Regulations, this letter serves as notice that, with respect to the above-specified plan (the "Plan"); we intend to utilize the alternative form of compliance with the reporting and disclosure requirements of Part 1 of Title I of ERISA.

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

1. Name and Address of Employer -
American Chemical Society
1155 Sixteenth Street, NW
Washington, D.C. 20036
2. Employer's Employer Identification Number - 53-0196572
3. The Employer declares that it maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
4. In addition to the Plan, the Employer maintains one other plan for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The number of participants on the effective date of this Plan (January 1, 2007) is expected to be 25. The number of participants in the American Chemical Society Supplemental Executive Retirement Plan is 5.

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,

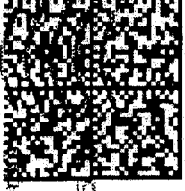
John Doran
John Doran
American Chemical Society

Print Name: John Doran

American Chemical Society

1155 SIXTEENTH STREET, N.W.
WASHINGTON, D.C. 20036-4892

WASHINGTON DC 20036
11 OCT 2006 PM 6



Secretary of Labor
Top Hat Plan Exemption
Employee Benefits Security Administration RM N-1513
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

