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U.S. DEPT. OF LABOR

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November 14, 2006

The ANGELL Pension Group, Inc.  
*Actuaries, Consultants and Administrators for Employee Benefit Plans*  
10 Hemingway Drive  
East Providence, Rhode Island 02915  
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**CERTIFIED MAIL, RETURN RECEIPT REQUESTED**

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

**Re: ISDA 457(b) Plan**

Dear Sir/Madam:

Enclosed for filing is the Disclosure Statement for the ISDA 457(b) Plan to meet the alternative method of compliance with the reporting and disclosure requirements of Part I of Title I of ERISA for top-hat plans pursuant to DOL Reg. Section 2520.104-23.

Very truly yours,

Peter L. Karlson, J.D., LL.M.  
Vice President  
General Counsel

PLK/tad  
TOPHAT DOL LTR.DOC\44751

Enclosure

cc: Huzefa Deesawala  
James Heggie

**REPORTING AND DISCLOSURE STATEMENT**  
**TOP HAT PLAN (DOL REG. §2520.104-23)**

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Name and Address of Employer: *International Swaps and Derivatives Association, Inc.*  
*360 Madison Avenue, 16th Floor*  
*New York, NY 10017*

EIN of Employer: *13-3298818*

*The Employer maintains a plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.*

Name of Plan: *ISDA 457(b) Plan*

Date of Adoption of Plan: *November 1, 2006*

Number of Plans: *One (1)*

Number of Members of Plan: *Seven (7)*

**INTERNATIONAL SWAPS AND  
DERIVATIVES ASSOCIATION, INC.**

By: *Robert A. Platt*

Dated: *11/7/06*

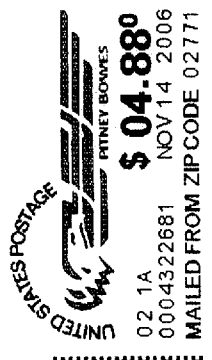
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East Providence, Rhode Island 02915

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