



**SHIPMAN & GOODWIN<sup>LLP</sup>**  
COUNSELORS AT LAW

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January 18, 2007

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**VIA CERTIFIED MAIL**

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

Re: Total Communications, Inc. Incentive Deferred Compensation Plan ("Plan")

Dear Secretary of Labor:

As legal counsel to Total Communications, Inc. (the "Employer"), I hereby notify you in accordance with DOL Regulation §2520.104-23 that the Employer has adopted its restated deferred compensation plan named the Total Communications, Inc. Incentive Deferred Compensation Plan (the "Plan"), and it will, as the Plan Administrator, utilize the alternative form of compliance with the reporting and disclosure requirements of Part 1 of Title I of the Employee Retirement Income Security Act of 1974 ("ERISA") as set forth in that Regulation. The restated Plan is effective November 1, 2006.

Pursuant to DOL Reg. § 2520.104-23(b), the following information is provided:

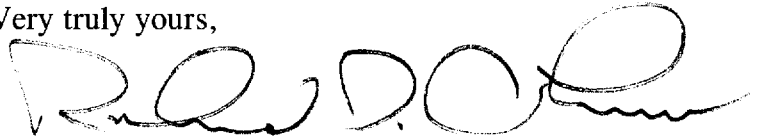
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|----|---------------------------------------|---|
| 1. | Name and Address of Employer:         | Total Communications, Inc.<br>333 Burnham Street<br>East Hartford, CT 06108 |
| 2. | Employer's Tax Identification Number: | 06-1020653  |

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3. The Employer hereby states that it maintains the Plan primarily for the purpose of providing deferred compensation to a select group of management or highly compensated employees. As of the date of this letter, the Plan is being made available to six such individuals.

Pursuant to DOL Reg. § 2520.104-23(b)(2), the Employer will provide the documents governing the Plan to the Secretary of Labor upon request as required by Section 104(a)(6) of ERISA.

Very truly yours,

A handwritten signature in black ink, appearing to read "Richard I. Cohen". The signature is fluid and cursive, with the first name "Richard" being the most prominent part.

Richard I. Cohen

RIC:cam

cc: Rhonda Tassie  
David Bucci

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