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**(Return Receipt Requested)**

January 16, 2007

Secretary of Labor  
 Top Hat Plan Exemption  
 Employee Benefit Security Administration  
 Room N-5644  
 U.S. Department of Labor  
 200 Constitution Avenue N.W.  
 Washington, D.C. 20210

**Re: Top Hat Plan Exemption Statement Filing; Deferred  
 Compensation Agreement Covering a Select  
 Management or Highly Compensated Employee**

07 JAN 23 AM 11:13

Dear Secretary:

Pursuant to 29 C.F.R. §2520.104-23, this letter will serve as a notice that, with respect to a certain executive deferred compensation agreement covering William M. Hogan, III, the undersigned intends to 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, as amended ("ERISA"). The agreement is dated December 29, 2006.

The following information is provided in accordance with Section 2520.104-23(b) of the aforesaid regulations, regarding the agreement:

1. Name and Address of the sponsor: Oatey Co.  
4700 W. 160<sup>th</sup> Street  
Cleveland, Ohio 44135
2. Oatey Co.'s Employer Identification Number: 34-0434900
3. Oatey Co. maintains the agreement primarily for the purpose of providing deferred compensation for a "select group of management or highly compensated employees," within the meaning of Sections 201(2), 301(a)(3) and 401(a) of ERISA. As of the date of this letter, there is only one individual covered by the agreement.

By filing this Top Hat Plan Exemption Statement, it is Oatey Co.'s intent to notify the U.S. Department of Labor of the existence of the agreement and to obtain exemption from certain of the reporting and disclosure requirements of ERISA as further specified in 29 C.F.R.

U.S. Department of Labor  
Top Hat Filing  
January 16, 2007  
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§2520.104-23. However, Oatey Co. hereby commits to furnish all relevant documents to the U.S. Department of Labor upon request.

Sincerely,

**OATEY CO.**

A handwritten signature in black ink, appearing to read "Gary A. Oatey", written in a cursive style.

Gary A. Oatey  
Chairman & CEO

cc: John J. McGowan, Jr., Esq.  
Baker & Hostetler LLP  
3200 National City Center  
Cleveland, OH 44114-3485

**Datey®**

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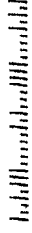
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