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January 25, 2007

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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

Dear Sir or Madam:

Re: Rundle-Spence Mfg. Co.
D.O.L. Required Filing

On behalf of Rundle-Spence Mfg. Co., I am enclosing a Top Hat filing form with respect to the Equity Appreciation Share Plan adopted by Rundle-Spence Mfg. Co. as of January 1, 2006. The filing is intended to meet the alternate form of compliance under the reporting and disclosure requirements of Part 1 of Title 1 of the Employee Retirement Income Security Act of 1974 ("ERISA"). See D.O.L. Reg. § 2520.104-23(b).

Please acknowledge receipt of this filing by date-stamping the enclosed copy of this filing and returning it to me in the enclosed envelope.

Please call me if you have any questions.

Yours very truly,

Adam R. Konrad

MW\1392003
Enc.

P.O. Box 2965, Milwaukee, WI 53201-2965 • 1000 North Water Street, Milwaukee, WI 53201
Telephone: 414-298-1000 • Facsimile: 414-298-8097 • Toll Free: 800-553-6215

Madison, WI • Telephone: 608-229-2200 • Toll Free: 800-728-6239
Waukesha, WI • Telephone: 262-951-4500 • Toll Free: 800-928-5529
Rockford, IL • Telephone: 815-633-5300 • Toll Free: 800-840-5420

STATEMENT OF UNFUNDED PLAN
FOR SELECT GROUPS OF MANAGEMENT
OR HIGHLY COMPENSATED EMPLOYEES:
"TOP HAT" PLAN

Employer's Name: Rundle-Spence Mfg. Co. (the "Employer")

Employer's Address: 2075 South Moorland Road
New Berlin, WI 53151

Employer's Tax I.D.: 39-0582260

Plan Adoption Date: January 1, 2006

Employer's Declaration
Regarding Plan:

The Employer adopted a Equity Appreciation Share Plan (the "Plan") primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. Any benefits from the Plan are paid as needed solely from the Employer's general assets.

Number of Employees
in Plan as of the
Date of Filing: 7.

Number of Deferred
Compensation Plans
Maintained by the
Employer: 1.

A complete copy of the Plan documents are available upon request.

Dated this 14 day of December, 2006.

RUNDLE-SPENCE MFG. CO.

BY David E. Spence
David Spence, President



1000 North Water Street, P.O. Box 2965
Milwaukee, WI 53201-2965

VERIFIED MAIL

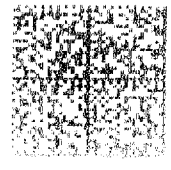


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PS Form 3800, 6-02



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TOP HAT PLAN EXEMPTION,
EMPLOYEE BENEFITS SECURITY ADM.
U.S. DEPT. OF LABOR, ROOM N-151E
200 CONSTITUTION AVENUE, NW
WASHINGTON DC 20210

