

2520080801146

August 27, 2007

Certified Mail - Return Receipt Requested

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

07 SEP - 3 AM 11:15

Re: ASR Deferred Compensation Plan

Dear Sir or Madam:

We are writing on behalf of our client, Administration Systems Research Corporation International. Our client recently established an unfunded pension plan for a select group of management or other highly compensated employees (a "top hat" plan). The new plan was effective as of July 1, 2007.

Pursuant to Department of Labor regulations Section 2520.104-23, we are supplying the following information to you:

1. Employer's name and address:  
  
Administration Systems Research Corporation International  
3033 Orchard Vista Dr, SE  
Grand Rapids, MI 49546
2. Employer's EIN: 38-2651185
3. Administration Systems Research Corporation International maintains a plan primarily for the purpose of providing deferred compensation for a select group of management or other highly compensated employees.
4. The name of the new plan is the ASR Deferred Compensation Plan. The plan currently has one participant.
5. A copy of the plan document will be provided upon request.

MILLER JOHNSON

EBSA

August 27, 2007

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Please contact us if you have any questions regarding this filing or need any additional information.

Sincerely,

MILLER JOHNSON

A handwritten signature in black ink, appearing to be 'F. Berrodin', written over a horizontal line.

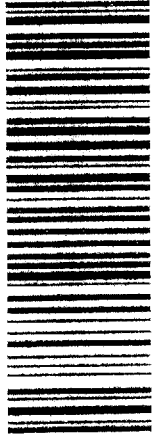
By

Frank E. Berrodin

FEB:mrt

cc: Mike Brandon

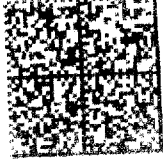
**CERTIFIED MAIL™**



7004 0550 0001 1312 5817

**MILLER  
JOHNSON**  
Attorneys and Counselors

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