

2520080801351

FULBRIGHT & JAWORSKI L.L.P.

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October 11, 2007

VIA FEDERAL EXPRESS

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

07 OCT 16 PM 2:45

Re: Det Norske Veritas (U.S.A.), Inc.- Top Hat Plan Exemption

Dear Sir or Madam:

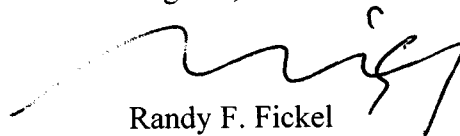
Det Norske Veritas (U.S.A.), Inc. (the "Employer") maintains the DNV Nonqualified Deferred Compensation Plan (the "Plan") primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The Plan is the only such plan sponsored by the Employer, and the Plan covers 50 employees.

This letter is intended to comply with the reporting and disclosure requirements of Part 1 of ERISA pursuant to Labor Regulations §2520.104-23.

EIN: 76-0187362
Address: 16340 Park Ten Place, Suite 100
Houston, TX 77084

If you have any questions, please contact the undersigned.

Regards,



Randy F. Fickel

cc: Ron Hoffmaster
Mike McCaffrey

From: Origin ID: RBDA (214)855-8000
Randy Fickel
Fulbright & Jaworski L.L.P.
2200 Ross Avenue
Suite 2800
Dallas, TX 752012784



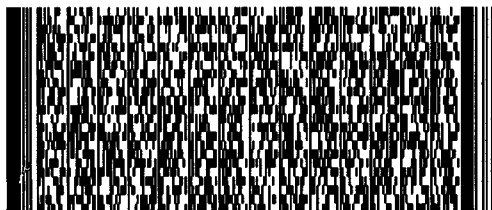
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SHIP TO: (214)855-7145 **BILL SENDER**
Employee Benefits Security Admin.
US Department of Labor
200 Constitution Ave NW
Rm N-1513
Washington, DC 202100001

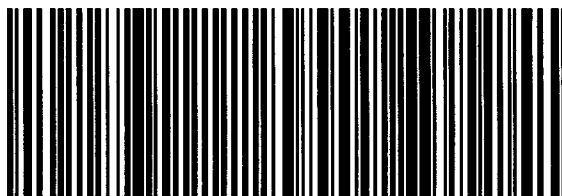


TRK# 7982 8526 8998
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PRIORITY OVERNIGHT

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20210



FOLD on this line and place in shipping pouch with bar code and delivery address visible

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2. Place the label in a waybill pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.
3. Keep the second page as a receipt for your records. The receipt contains the terms and conditions of shipping and information useful for tracking your package.