



May 5, 2008

Top Hat Plan Exemption
 Employee Benefits Security Administration
 Room N-1513
 U. S. Department of Labor
 200 Constitution Avenue, N. W.
 Washington, D. C. 0210-0002

Re: Safeway, Inc. Top Hat Plan(s)

To Whom It May Concern:

Pursuant to Department of Labor Regulation Section 2520.104-23, please find below a statement concerning unfunded arrangements maintained primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees:

Employer's Name: Safeway, Inc.
 Employer's Address: 5918 Stoneridge Mall Road
 Pleasanton, CA 94588-3492

Employer's EIN: 94-3019135

Name of Plan:	Date Plan Became Subject to Title I of ERISA ¹ :
Retirement Restoration Plan of Safeway, Inc.	December 31, 2002
Retirement Restoration Plan of Safeway, Inc. II	January 1, 2005
Safeway Executive Deferred Compensation Plan	December 19, 2003
Safeway Executive Deferred Compensation Plan II	October 29, 2007

Number of Such Plans Maintained by the Employer: 4

Name of Plan:	Number of Employees in Plan:
Retirement Restoration Plan of Safeway, Inc.	13
Retirement Restoration Plan of Safeway, Inc. II	127

¹ The Retirement Restoration Plan of Safeway Inc. II and the Safeway Executive Deferred Compensation Plan II were adopted pursuant to changes required under section 409A of the Internal Revenue Code of 1986, as amended.

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Name of Plan:	Number of Employees in Plan:
Safeway Executive Deferred Compensation Plan	113
Safeway Executive Deferred Compensation Plan II	177

The plans described above are maintained primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. A copy of each plan is available upon request.

Sincerely,



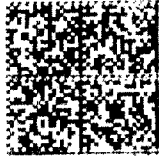
Michael J. Boylan
Vice President



4410 ROSEWOOD DRIVE
PLEASANTON, CA 94588-3492

EMPLOYEE BENEFITS DEPARTMENT

Lisa Montano



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