

**UNITED TUBE CORPORATION**

960 Lake Road Medina, Ohio 44256  
Phone 330.725.4196 Fax 330.723.2092  
Sales 800.321.TUBE (8823) www.unitedtube.com

EBSA/PUBLIC DISCLOSURE

2009 OCT 13 PM 3: 06

October 5, 2009

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

Re: Deferred Compensation Agreement fbo George W. Wattles, Virginia S. Wattles, Dana W. Hall, and Todd W. Bailey

Dear Secretary:

Pursuant to Section 2520.104-23 of the Department of Labor's Regulations, this letter will serve as notice that, with respect to the Deferred Compensation Agreement fbo George W. Wattles, Virginia S. Wattles, Dana W. Hall, and Todd W. Bailey (The Plan), the undersigned intends to use 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 (ERISA), which alternative form of compliance is provided in the aforesaid Regulations Section.

Pursuant to Regulations Section 2520.104-23(b)(1), the following information is provided:

1. Name and Address of Employer:  
United Tube Corporation  
960 Lake Road  
Medina, Ohio 44256
2. Employer Identification Number:  
34-0651344
3. The Employer hereby declares that it maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

Page 2

4. The Employer hereby states that it maintains two plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees, and the number of employees in each such Plan is as follows:
  - a. Deferred Compensation Agreement fbo George W. Wattles, Virginia S. Wattles, Dana W. Hall, and Todd W. Bailey (The Plan): four employees covered.
  - b. Deferred Compensation Agreement fbo Norman Smith: one employee covered.

Pursuant to Regulations Section 2520.104-23(b)(2), the Employer will provide Plan documents, if any, to the Secretary of Labor upon request as required by Section 104(a)(1) of ERISA.

Very truly yours,



Frank J. Sadowski, CPA  
Treasurer  
United Tube Corporation



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Room N-1513  
U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, DC 20210

Re: Deferred Compensation Agreement fbo Norman Smith

Dear Secretary:

Pursuant to Section 2520.104-23 of the Department of Labor's Regulations, this letter will serve as notice that, with respect to the Deferred Compensation Agreement fbo Norman Smith (The Plan), the undersigned intends to use 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 (ERISA), which alternative form of compliance is provided in the aforesaid Regulations Section.

Pursuant to Regulations Section 2520.104-23(b)(1), the following information is provided:

1. Name and Address of Employer:  
United Tube Corporation  
960 Lake Road  
Medina, Ohio 44256
2. Employer Identification Number:  
34-0651344
3. The Employer hereby declares that it maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

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4. The Employer hereby states that it maintains two plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees, and the number of employees in each such Plan is as follows:
  - a. Deferred Compensation Agreement fbo Norman Smith (The Plan): one employee covered.
  - b. Deferred Compensation Agreement fbo George W. Wattles, Virginia S. Wattles, Dana W. Hall, and Todd W. Bailey: four employees covered.

Pursuant to Regulations Section 2520.104-23(b)(2), the Employer will provide Plan documents, if any, to the Secretary of Labor upon request as required by Section 104(a)(1) of ERISA.

Very truly yours,



Frank J. Sadowski, CPA  
Treasurer  
United Tube Corporation



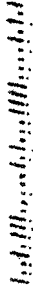
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