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INTERNATIONAL TRANSPORTATION SERVICE, INC.

 EBSA/PUBLIC DISCLOSURE
 2009 DEC 16 AM 7:55

December 9, 2009

REGISTERED MAIL; RETURN RECEIPT REQUESTED

Top Hat Plan Exemption
 Employee Benefits Security Administration
 Room N-1513
 U.S. Department of Labor
 200 Constitution Avenue N.W.
 Washington D.C. 20210

Re: Alternative Method of Compliance under DOL Reg. Section 2520.104-23

Dear Sir or Madam:

The purpose of this letter is to comply with the "Alternative Method of Compliance" for reporting and disclosure (as set forth in DOL Reg. Section 2520.104-23) with respect to the **2009 Supplemental Executive Retirement Plan** (the "Plan") established by International Transportation Service, Inc., a California company (the "Company") and its subsidiaries.

In accordance with that Section, we provide you with the following:

1. Name and Address of the Company.

International Transportation Service, Inc.
 Attn: Human Resources Department
 1281 Pier G Way
 Long Beach, CA 90802

2. Employer Identification No.

95-2680214

3. Declaration.

The Company established, **effective September 1, 2009**, the Plan, which is maintained primarily for the purpose of providing deferred compensation for a select group of management and/or highly compensated employees of the Company. Currently, 7 executives participate in the Plan.

4. Documents.

With respect to the Plan, the Company will provide to the Secretary of Labor, upon request, copies of the Plan documents, if any, that are required by Section 104 (a) (1) of the Employee Retirement Income Security Act of 1974 to be filed with the Secretary of Labor.

Enclosed is a copy of this letter, which we ask that you date-stamp and return to us in the enclosed, self-addressed and stamped envelope.

Should have any questions about this letter, please do hesitate to contact us at the above address.

Sincerely,

Laurence L. Bear
 Vice President, Administration
 (562) 590-6818

Cc: Tracy L. Portillo, Assistant Director Human Resources

AITTS

INTERNATIONAL TRANSPORTATION SERVICE, INC.
POST OFFICE BOX 22704, LONG BEACH, CALIFORNIA 90801-5704

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