

EBSA/PUBL

2011 MAY -

3:01

April 28, 2011

Direct Phone Number: 713/547-2233  
Direct Fax Number: 713/236-5423  
Jesse.Gelsomini@haynesboone.com

**VIA Certified Mail No. 7160 3901 9848 8357 3961**  
**And Return Receipt Requested**

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

EBSA/PUBLIC DISCLOSURE  
2011 MAY - 3 PM 3:01

**Re: HCC Insurance Holdings, Inc. Nonqualified Deferred Compensation Plan for Christopher J.B. Williams (the "Plan") [28553.80]**

Dear Ms. Secretary:

I am an attorney representing HCC Insurance Holdings, Inc. (the "**Company**"). Pursuant to Section 2520.104-23 of the DOL Regulations, this letter will serve as notice that, with respect to the above-referenced Plan, the Company 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.

The Plan is originally effective as of May 1, 2011. This letter is intended to provide the information below regarding the Plan and the Company.

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

1. Name and Address of Employer: HCC Insurance Holdings, Inc.  
13403 Northwest Freeway  
Houston TX 77040
2. Company's Employer Identification Number: 76-0336636.

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3. The Company hereby declares that it maintains the Plan primarily for the purpose of providing deferred compensation to the members of a select group of management or highly compensated employees of the Company or its commonly-owned affiliates.
4. The Company maintains the Plan for the purpose of providing deferred compensation to its President, who is a member of a select group of management or highly compensated employees. Together, the Company and its affiliates employ approximately 1,894 employees on a controlled group basis (as determined under Section 414 of the Internal Revenue Code). The Company maintains one other nonqualified deferred compensation plan that covers only the Chief Executive Officer of the Company, who is another member of a select group of management or highly compensated employees.

Pursuant to DOL Regulation Section 2520.104-23(b)(2), the Company will provide related documents to the Secretary of Labor upon request as required by Section 104(a)(1) of ERISA.

Very truly yours,

HAYNES AND BOONE, L.L.P.

By: 

Jesse J. Gelsomini, Partner

cc: Randy Rinicella  
Brian Giovannini [Firm]

haynesboone

Attorneys and Counselors  
1221 McKinney Street, Suite 2100  
Houston, Texas 77010-2007

**CERTIFIED MAIL**



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USA/PUBLIC PROCEEDING  
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