

2520111670575



EBSA/PUBLIC DISCLOSURE

2011 JUN -1 PM 1:17

May 4, 2011

VIA CERTIFIED MAIL/
RETURN RECEIPT REQUESTED

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

RE: Harper International Corporation Stock Appreciation Rights Plan (the "Plan")

This letter will serve as notice that the above Plan has elected 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") set forth in DOL Reg. §2520, 104-23.

Pursuant to Reg. §2520.104-23(b)(1), the following information is provided:

1. The Employer is

Harper International Corporation
100 West Drullard Avenue
Lancaster, New York 14086

2. The Employer's EIN is 16-1335540 .

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. There are 9 participants in the Plan.

4. The Employer does not maintain any other plan for this purpose.

The Employer acknowledges its obligation to provide Plan documents to the Secretary of Labor upon request.

Very truly yours,

Harper International Corporation

By:

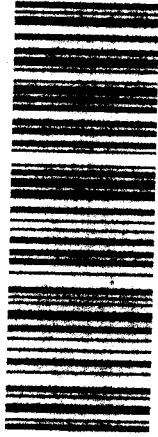

Wayne Robinson

EBSA/PUBLIC DISCLOSURE
2011 MAY 32 PM 1:17



Growth, Protection, Succession
BUSINESS AND CORPORATE LAW

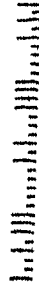
CERTIFIED MAIL



7030 1870 0003 4867 3151

**RETURN RECEIPT
REQUESTED**

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



UNITED STATES POSTAGE
FITNEY BOWES
02 1R
0006559700
MAY 23 2011
\$ 06.030
MAILED FROM ZIP CODE 14604

