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John A. Steer Co.  
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EBSA/PUBLIC DISCLOSURE

2011 JUN 14 PM 2:33

December 1, 2010

BY CERTIFIED MAIL NO. \_\_\_\_\_  
RETURN RECEIP REQUESTED

United States Department of Labor  
Employee Benefits Security Administration  
Top Hat Plan Exemption  
200 Constitution Ave., N.W., Ste N-1513  
Washington, D.C. 20210

**Headquarters**  
28 SOUTH SECOND ST  
PHILADELPHIA  
PA 19106  
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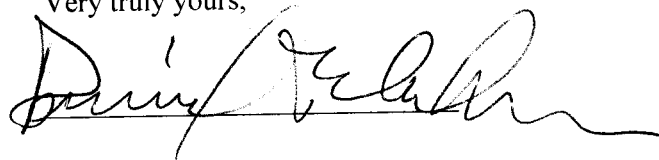
RE: John A. Steer Co. Supplemental Executive Retirement Plan

Dear Sir or Madam:

In accordance with Department of Labor Regulation § 2520.104-23, this letter will service as the alternative method of compliance with the reporting and disclosure requirements of Part I of Title I of the Employee Retirement Income Security Act of 1974, as amended, for a pension plan for a select group of management or highly compensated employees.

1. John A. Steer Co. a Pennsylvania corporation, (the "Sponsor") maintains and sponsors the John A. Steer Co. Supplemental Executive Retirement Plan (the "Plan").
2. The address of the Sponsor is 28 South 2<sup>nd</sup> Street, Philadelphia, PA 19106.
3. The employer identification number assigned by the Internal Revenue Service to the Sponsor is 23-1902358.
4. The Sponsor declares it maintains the following plan primarily for the purposes of providing deferred compensation for a select group of management or highly compensated employees: the Plan.
5. There are 3 employees participating in the Plan.

Very truly yours,



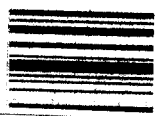
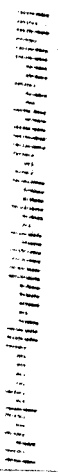
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NORFOLK VA 23502  
TEL 757 455 5884  
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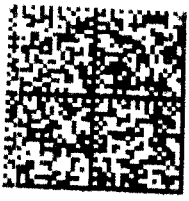
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United States Department of Labor  
Employee Benefits Security Admin.  
Top Hat Plan Exemption  
200 Constitution Ave, ~~NEW YORK~~  
Washington DC 20210

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