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EBSA/PUBLIC DISCLOSURE
2011 DEC 13 PM 1:44



December 1, 2011

**BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

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

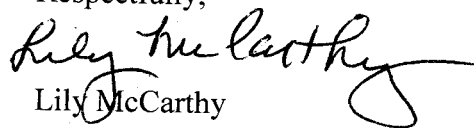
Re: *ASARCO LLC Supplemental Retirement Plan*

Dear Secretary:

In compliance with the requirements of the alternative method of reporting and disclosure under Part I of Title I of the Employee Retirement Income Security Act of 1974, as provided for unfunded pension plans maintained by an employer for a select group of management or highly compensated employees pursuant to 29 C.F.R. section 2520.104-23, set forth below is the required information regarding the ASARCO LLC Supplemental Executive Retirement Plan (the "Plan"):

Purpose of the Plan:	The purpose of the Plan is to provide deferred compensation for a select group of management or highly compensated employees.
Number of Plans:	1
Number of Participants:	3
Name of Employer:	ASARCO LLC
Address of Employer:	5285 E. Williams Circle, Suite 2000, Tucson, Arizona 85711
EIN:	81-0666284

Respectfully,


Lily McCarthy

cc: Erwin Kratz



ASARCO
GRUPO MEXICO

Benefits/McCarthy

CERTIFIED MAIL



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MAILED FROM ZIP CODE 85711

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