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June 15, 2012

Certified Mail/Return Receipt Requested 7009 2820 0002 7763 9958

Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

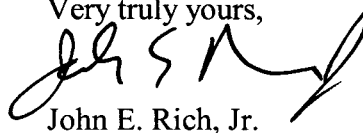
Re: Axis Communications, Inc.

Dear Sir/Madam:

I have enclosed the Top Hat Plan Filing form with respect to the Axis Communications Supplemental Retirement Agreement. By this filing, Axis Communications, Inc. does not admit that this Plan is subject to ERISA. This is a protective filing. This filing is made to avoid the full disclosure reporting requirements, in the event that a determination is made that the Plan is subject to ERISA.

If you have any questions with regard to the Plan or the Top Hat Plan filing, please contact me at your convenience.

Very truly yours,



John E. Rich, Jr.

JER/mg
Enclosure
cc: Michelle Strasburger

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"TOP HAT" PLAN FILING

(Statement Required Under
Alternative Method of Compliance
With ERISA Reporting and
Disclosure Rules (DOL Reg. §2520.104-23))

1. Name and Address of Employer:

Axis Communications, Inc.
300 Apollo Drive
Chelmsford, Massachusetts 01824

2. Employer Identification Number:

043017622

3. The Employer maintains one or more plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

4. Number of Such Plans:

One (1)

5. Number of Employees Covered in Each Such Plan:

One (1)



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