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May 7, 2015

By Federal Express

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

2015 MAY 11 PM 2:
11:00 AM

Re: NBT Bancorp Inc. Enhanced Separation Pay Plan

Dear Sir or Madam:

Under 29 C.F.R. section 2520.104-23, the Department of Labor has provided administrators of certain pension plans maintained for a select group of management or highly compensated employees with an alternative method of compliance with the reporting and disclosure provisions of Part 1 of Title I of ERISA. Pursuant to such provision and as an authorized representative of NBT Bancorp Inc., I respectfully submit the enclosed ERISA Alternative Compliance Statement for the NBT Bancorp Inc. Enhanced Separation Pay Plan.

Please do not hesitate to contact me, at the email address or phone number listed below, with any questions or concerns you may have.

Sincerely,



Christian H. Chandler

Partner
christian.chandler@hoganlovells.com
D 202-637-3691

Enclosures

**ERISA ALTERNATIVE COMPLIANCE STATEMENT
PURSUANT TO 29 C.F.R. SECTION 2520.104-23**

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

FROM: NBT Bancorp Inc.
52 South Broad Street
Norwich, New York 13815

Employer Identification Number: 16-1268674

This Alternative Compliance Statement is meant to comply with the requirements of 29 C.F.R. Section 2520.104-23, alternative method of compliance for pension plans for certain selected employees.

The above employer maintains ten plans primarily for the purpose of providing deferred compensation benefits for a select group of management or highly compensated employees.

- The NBT Bancorp Inc. Supplemental Retirement Income Plan for Certain Management and Highly Compensated Employees of NBT Bank, N.A. (Top Hat Plan), with twelve (12) employees currently in the plan.
- The NBT Bancorp Inc. Supplemental Executive Retirement Plan, with four (4) employees currently in the plan.
- The NBT Bancorp Inc. Deferred Compensation Plan with forty-four (44) employees currently in the plan.
- The Alliance Bank, N.A. Executive Incentive Retirement Plan with five (5) employees currently in the plan.
- The Salary Continuation Plan of the First National Bank of Lake Ariel with two (2) employees currently in the plan.
- The Amended and Restated Supplemental Retirement Agreement between Alliance Financial Corporation, Alliance Bank, N.A. and Jack H. Webb with one (1) employee currently in the plan.
- The Oneida Valley National Bank Supplemental Executive Retirement Plan with five (5) employees currently in the plan.
- The Oswego County Savings Bank Executive Supplemental Retirement Income Agreement for Gregory J. Kreis with one (1) employee currently in the plan.
- The First National Bank of Northern New York Index Plan with one (1) employee currently in the plan.
- The NBT Bancorp Inc. Enhanced Separation Pay Plan with seven (7) employees currently in the plan.

The Enhanced Separation Pay Plan is effective as of January 21, 2015.

NBT BANCORP INC.

By: 

Name: _____ Catherine M. Scarlett _____

Title: _EVP, Chief Human Resources Officer_____

From: (202) 637-5600
Adrienne Jack
Hogan Lovells US LLP
Columbia Square
555 Thirteenth Street, N.W.
Washington, DC 20004

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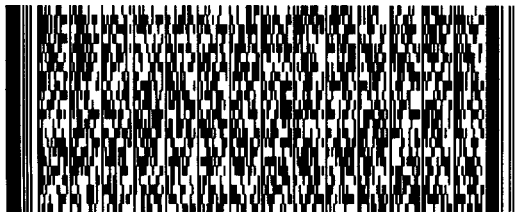


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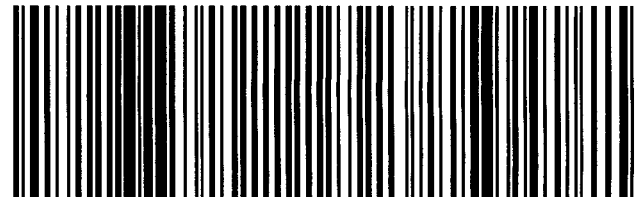
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