

06C 1206

# FROST & JACOBS

2500 PNC CENTER • 201 EAST FIFTH STREET • POST OFFICE BOX 5715 • CINCINNATI OHIO 45201-5715 • (513) 651 6800

DENNIS J BARRON  
 JAMES S WAGNER  
 RONALD E. HEINLEN  
 JAMES R. ADAMS  
 WILLIAM D. BARNETT III  
 JOHN S. STITH  
 PERRIE E. CLANNINGHAM  
 EDWARD J. ADAMS  
 ALBERT E. HEINEN III  
 LAWRENCE H. KYTTE, JR.  
 T. STEPHEN PHILLIPS  
 THOMAS P. REDBERT  
 JAMES E. L. LAWRENCE  
 ROBERT A. DEBLING  
 GERALD L. BALDWIN  
 JOHN G. FARNELL  
 RICHARD J. BRIDSON  
 FREDERICK J. McCAVRAN  
 NEIL SAMULIN  
 JOHN H. APPEL  
 MICHAEL F. HAVERKAMP  
 RICHARD A. GETTY  
 JOSEPH J. DENNER  
 SAMUEL NEW SCODGEN  
 SUSAN GREGGIAN FALLER  
 JEFFERY R. FUSH  
 THOMAS A. SWOFFE  
 DENNIS J. MURPHY

TODD H. BAILEY  
 LARRY H. MCELLEN  
 MARK H. LONGBENDER, JR.  
 GEORGE E. VLRD  
 DAVID G. HORN  
 WILLIAM H. HAWKINS II  
 DONALD L. CRAM  
 MYRON L. DALE  
 THOMAS V. WILLIAMS  
 E. RICHARD OBERSONMADT  
 MARTIN E. MOONEY  
 DAVID C. CLISON  
 JOHN I. CADWALLADER  
 THOMAS D. ANTHONY  
 KATHLEEN W. CARR  
 WALTER E. HASKERTY  
 MICHAEL K. YARBROUGH  
 DAVID T. ORDALL  
 THOMAS E. TAYLOR  
 ELIZABETH K. LANIER  
 CHARLES E. SCHROEDER  
 PAUL W. CASPER, JR.  
 DOUGLAS E. HART  
 RICHARD M. GOSCHLER  
 BETH A. MYERS  
 DEBORAH S. ADAMS  
 JOHN E. BARNES  
 PATRICIA D. LAUS

JOSEPH W. FLYE  
 GREGORY P. ADAMS  
 DENISE H. McQUELLAND  
 STEPHEN N. HADSHAY  
 WILLIAM G. STRANGFELD  
 GRANT S. COVAIN  
 CLAUDIA L. SCHAEFER  
 VINCENT E. WALKER  
 W. RUSSELL WILSON  
 BETH SCHNEIDER NAYLOR  
 PERN E. GOLDMAN  
 MARK H. KLUMMESER  
 BARBARA F. APRLEGARTH  
 DANIEL J. FIGARD  
 WILLIAM W. FORD III  
 GREGORY A. KEYSER  
 RAYMOND G. NEUSCH  
 WALKER P. MAYO  
 MARIE MARISCALDO BOYLE  
 DOUGLAS D. THOMSON  
 ROBERT S. KAMBER  
 CHRISTOPHER P. FINNEY  
 ROY MARTIN LEWIS  
 LAUREN A. SELAN  
 GREG E. MITCHELL  
 WILLIAM L. BENNETT III  
 CARLA MAURIZI RUSCOON  
 SCOTT A. MEYER

NANCY DORISE DEWITT  
 KEVIN N. McMURRAY  
 PAM GATSBY O'GUINN  
 JOHN G. JULIS  
 KAREN JOHANNES BOWMAN  
 D. SCOTT GURNEY  
 RONALD E. GOLD  
 THAD T. REISER  
 MINA T. JONES  
 BRUCE G. HOPKINS  
 DAVID S. BRIDGE  
 DANIEL W. SCHARFF  
 MARK E. FUSBY  
 NANCY S. RUE  
 ADAM P. HALL  
 STEVEN L. SMITH  
 HILLA M. ZERBST  
 SCOTT D. PHILLIPS  
 JOHN G. GURMINGS  
 THOMAS P. PRICE  
 MATTHEW S. MASSARELLI  
 CHRISTOPHER J. WILSON  
 CHRISTA F. NORDELLING  
 MARVELLEN BUNTON MYNHEAR  
 SUSAN McCHLEY LUCCI  
 JONATHAN A. CONTE  
 J. PAUL ALLEN  
 C. THOMAS BEZELL

ELIZABETH A. STAUTBERG  
 LAURA A. RYAN  
 JACK S. HARRISON  
 STUART S. FRANKEL  
 PATENT TRADEMARK AND  
 COPYRIGHT ATTORNEYS  
 GERRON R. YUNGBLUT  
 JAMES H. HAYES  
 DAVID E. SCHMIT  
 KENNETH S. GERMAN  
 EDWIN R. ACHESON, JR.  
 LOUIS K. ELLING  
 FREDERICK H. GRISSELL  
 MARTIN J. MILLER  
 JAY R. DEHNMARK  
 SENIOR PARTNERS  
 CHARLES G. PUCHTA  
 HENRY W. HOBSON, JR.  
 J. LESLIE BREWSTER II  
 JERRY L. COVAIN  
 JOHN K. ROSE  
 DONALD MCG ROSE  
 DANIEL P. DOOLEY

COUNSEL  
 BARRY J. LEVEY  
 JACKSON W. WHITE  
 LAWRENCE E. FONGY  
 P. REO LEMASTERS  
 FREDERICK W. KENDL  
 ROSE E. BAUGHMAN II  
 THOMAS E. CRAFTON  
 GEORGE W. TALLAFERRO  
 ALBERT E. STRASSER  
 ALAN R. VOGELER  
 JOSEPH J. CONNAUGHTON  
 VERENA SMITH  
 ANTHONY W. HOBSON  
 RETIRED PARTNERS  
 WILLIAM R. BEAMAN  
 R. D. KLAUSMEYER  
 JAMES G. HEADLEY  
 JOHN W. MELVILLE  
 JOSEPH W. HOFFMAN  
 STANLEY H. FOSTER  
 NOT ADMITTED IN OHIO  
 FACSIMILE (513) 651-6881  
 TELETYPE 21 488 F&J CND  
 CABLE FROSTJAC  
 WRITERS DIRECTOR NUMBER  
 (513) 651-6745

May 3, 1994

RECEIVED  
 FEDERAL ELECTION  
 COMMISSION  
 OFFICE OF GENERAL  
 COUNSEL  
 MAY 5 10 11 AM '94  
 RECEIVED  
 FEDERAL ELECTION  
 COMMISSION  
 OFFICE OF GENERAL  
 COUNSEL  
 MAY 5 10 11 AM '94

Jonathan Levin, Esq  
 Federal Elections Commission  
 Office of General Counsel  
 999 E Street, N W  
 Washington, D C 20463

Re: Armco Steel Company, L.P./AK Steel Corporation

Dear Mr Levin

This letter is in response to your request for additional information about the Board of Directors of AK Holding and AK Steel Corporation

According to information provided to me by AK Steel Corporation, the following events occurred in connection with the initial public offering

- Prior to the IPO, the general partner of Armco Steel Company, L P , AK Management, changed its name to AK Steel Corporation The directors of Armco Steel Company, L P (T C Graham, J F Will, K Emoto, J B Corey, D G Harmer, K Yamaguchi and T Yanazawa) became the directors of AK Steel Corporation
- Subsequently, AK Holding was formed It initially had three directors (T.C Graham, J F Will and K Emoto)
- After the IPO, four independent directors (C Tang, B Guiton Hill, J A Georges and R E Northam) were added to the Boards of AK Holding and AK Steel At the same time, Messrs Corey, Harmer, Yamaguchi and Yanazawa resigned from the Board of AK Steel

**FROST & JACOBS**

**Jonathan Levin, Esq**

**May 3, 1994**

**Page 2**

**I hope this information satisfies your request. Should you require any additional information, please don't hesitate to contact me.**

**Very truly yours,**



**Grant S Cowan**

**GSC/gc**

**cc John G Hritz, Esq**

**0105068 01**