

SHARES	6	SHARED VOTING POWER
BENEFICIALLY		-0-
OWNED BY EACH	7	SOLE DISPOSITIVE POWER
REPORTING		356,300
PERSON WITH	8	SHARED DISPOSITIVE POWER
		-0-
9	AGGREGATE AMOUNT BENEFICIALLY OWNED BY EACH REPORTING PERSON	
	356,300	
10	CHECK IF THE AGGREGATE AMOUNT IN ROW (9) EXCLUDES CERTAIN SHARES	
	Not applicable	
11	PERCENT OF CLASS REPRESENTED BY AMOUNT IN ROW 9	
	6.54%	
12	TYPE OF REPORTING PERSON	
	IA	

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Item 1(a) Name of Issuer: ROCKY SHOES & BOOTS CORPORATION

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Item 1(b) Address of Issuer's Principal Executive Offices:

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39 EAST CANAL STREET
NELSONVILLE, OH 45764

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Item 2(a) Name of Person Filing: BENSON ASSOCIATES, LLC

Item 2(b) Address of Principal Business Office or, if none, Residence:

111 S.W. FIFTH AVENUE, SUITE 2130
PORTLAND, OREGON 97204

Item 2(c) Citizenship: OREGON

Item 2(d) Title of Class of Securities: COMMON STOCK, NO PAR VALUE

Item 2(e) CUSIP Number: 774830103

Item 3 If this statement is filed pursuant to Rules 13d-1(b) or 13d-2(b), check whether the person filing is a:

(e) Investment Adviser registered under Section 203 of the Investment Advisers Act of 1940 --

Item 4 Ownership

The following information is as of December 31, 1998:

(a) Amount Beneficially Owned: 356,300

(b) Percent of Class: 6.54

- (c) Number of shares as to which such person has: 356,300
 - (i) Sole power to vote or to direct the vote: None
 - (ii) Shared power to vote or to direct the vote: 356,300
 - (iii) Sole power to dispose or to direct the disposition of: None
 - (iv) Shared power to dispose or to direct the disposition of:

Item 5 Ownership of Five Percent or Less of a Class:

If this statement is being filed to report the fact that as of the date hereof the reporting person has ceased to be the beneficial owner of more than five percent of the class of securities, check the following [].

Item 6 Ownership of More than Five Percent on Behalf of Another Person:

PERSONS OTHER THAN BENSON ASSOCIATES, LLC HAVE THE RIGHT TO RECEIVE DIVIDENDS FROM OR THE PROCEEDS OF THE SALE OF THE LISTED SECURITY. NO SUCH RIGHT TO RECEIVE PROCEEDS OR DIVIDENDS RELATES TO MORE THAN 5 PERCENT OF THE CLASS.

Item 7 Identification and Classification of the Subsidiary which Acquired the Security Being Reported on by the Parent Holding Company:

Not applicable

Item 8 Identification and Classification of Members of the Group:

Not applicable

Item 9 Notice of Dissolution of Group:

Not applicable

Item 10 Certification:

By signing below the undersigned certifies that, to the best of their knowledge and belief, the securities referred to above were acquired in the ordinary course of business and were not acquired for the purpose of and do not have the effect of changing or influencing the control of the issuer of such securities and were not acquired in connection with or as a participant in any transaction having such purpose or effect.

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SIGNATURE

After reasonable inquiry and to the best of the knowledge and belief of the undersigned, the undersigned certifies that the information set forth in this statement is true, complete, and correct.

Benson Associates, LLC hereby disclaims beneficial ownership of the securities held by it in a fiduciary capacity as set forth in this Schedule 13G.

February 11, 1999

BENSON ASSOCIATES, LLC

By /s/ Mark D. Cooper
Member