## UNITED STATES SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549

SCHEDULE 13G

INFORMATION TO BE INCLUDED IN STATEMENTS FILED PURSUANT TO RULES 13d-1(b) AND (c) AND AMENDMENTS THERETO FILED PURSUANT TO 13d-2(b)

(Amendment No. -) \*

Rocky Shoes & Boots Corporation (Name of Issuer)

Common Stock, no par value (Title of Class of Securities)

774830103 (CUSIP Number)

Check the  $\,$  appropriate box to designate the rule pursuant to which this Schedule is filed:

|X| Rule 13d-1(b)

|-| Rule 13d-1(c)

|-| Rule 13d-1(d)

\*The remainder of this cover page shall be filled out for a reporting person's initial filing on this form with respect to the subject class of securities, and for any subsequent amendment containing information which would alter the disclosures provided in a prior cover page.

The information required in the remainder of this cover page shall not be deemed to be "filed" for the purpose of Section 18 of the Securities Exchange Act of 1934 ("Act") or otherwise subject to the liabilities of that section of the Act but shall be subject to all other provisions of the Act (however, see the Notes).

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<table></table>		
 <s> 1</s>	<pre></pre>	
2	CHECK THE APPROPRIATE BOX IF A MEMBER OF A GROUP	(a)  -  (b)  X
3	SEC USE ONLY	
 4	CITIZENSHIP OR PLACE OF ORGANIZATION OREGON	
	5 SOLE VOTING POWER	

356,300

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NUMBER OF

	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				

						- 2 -		
Item 1(a)	Name of Issuer: RC	OCKY SHOES	& BOOTS CORPORATION					
				(0)				
~~Item 1(b)~~	Address of Issuer's	Principal	Executive Offices:	39 EAST CANAL STREET				
				NELSONVILLE, OH 45764				
T1 2 ( . )								
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 AVEN PORTLAND, OREGON 9		2130					
Item 2(c)	Citizenship: OREGO	)N						
( ,								
Item 2(d)	Title of Class of S	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) x 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 Ber	eficially	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:

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 [].

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

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,  $\mbox{LLC}$  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