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UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, DC 20549

SCHEDULE 13G

Under	The	Securities	Exchange	Act	of	1934
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(AMENDMENT NO.) *

Rocky Shoes and Boots Inc.

(Name of Issuer)

Common Stock

(Title of Class of Securities)

774830103

(CUSIP Number)

December 31, 2004

December 31, 2004

(Date of Event which requires filing of this statement)

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).

Page 1 of 7 Pages

1	NAME OF REPORTING S.S. OR I.R.S. ID		Л
	-	13-3958232	
2	CHECK THE APPROPI	RIATE BOX IF A MEMBER OF A GROU	JP*
			(a) / /
			(b) / /
 3	SEC USE ONLY		
4	CITIZENSHIP OR P	LACE OF ORGANIZATION	
		Delaware	
		5 SOLE VOTING POWER	
		242,500	
S	NUMBER OF HARES BENEFICIALLY	6 SHARED VOTING POW	 ER
	OWNED BY EACH	_	
	REPORTING PERSON WITH	7 SOLE DISPOSITIVE 1	POWER
		242,500	
		8 SHARED DISPOSITIVE PO	DWER
		-	
9	AGGREGATE AMOUNT I	BENEFICIALLY OWNED BY EACH REPO	ORTING PERSON
		242,500	
10	CHECK IF THE AGGRI	EGATE AMOUNT IN ROW (9) EXCLUDE	ES CERTAIN SHARES*
		-	
11	PERCENT OF CLASS I	REPRESENTED BY AMOUNT IN ROW 9	
	TYPE OF REPORTING	5.2%	
12	TIPE OF REPORTING	IA	
	* *SEE	INSTRUCTION BEFORE FILLING OUT	 Г!
CUS	IP No. 774830103	13G	Page 3 of 7 Pages
 1	NAME OF REPORTING	PERSON	
	S.S. OR I.R.S. ID	ENTIFICATION NO OF ABOVE PERSON Robert E Kern Jr.	A

- -----

		(c) / / (d) / /
SEC USE	ONLY	
CITIZENSHIP OF	PLACE OF	ORGANIZATION
	U.S.A.	
	5	SOLE VOTING POWER
NUMBER OF SHARES BENEFICIALLY		-
DWNED BY EACH	6	SHARED VOTING POWER
REPORTING PERSON WITH		242,500 - (See Schedule Item 4 incorporated by reference)
	7	SOLE DISPOSITIVE POWER
		-
	8	SHARED DISPOSITIVE POWER
		242,500 - (See Schedule Item 4 incorporated by reference)

242,500 - (See Schedule Item 4

incorporated by reference)

______ 10 CHECK IF THE AGGREGATE AMOUNT IN ROW (9) EXCLUDES CERTAIN SHARES*

PERCENT OF CLASS REPRESENTED BY AMOUNT IN ROW 9

5.2%

12 TYPE OF REPORTING PERSON*

_ ______ *SEE INSTRUCTION BEFORE FILLING OUT!

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NAME OF REPORTING PERSON S.S. OR I.R.S. IDENTIFICATION NO OF ABOVE PERSON David G. Kern

2 CHECK THE APPROPRIATE BOX IF A MEMBER OF A GROUP* (e) //

(f) //

3 SEC USE ONLY

CITIZENSHIP OR PLACE OF ORGANIZATION

	U.S.A.		
	5 SOLE VOTING POWER		
NUMBER OF	-		
SHARES BENEFI OWNED BY	CIALLY6 SHARED VOTING POWER		
EACH REPORTING	242,500 - (See Schedule Item 4		
PERSON WITH	incorporated by reference)		
	7 SOLE DISPOSITIVE POWER		
	8 SHARED DISPOSITIVE POWER		
	242,500 - (See Schedule Item 4 incorporated by reference)		
9 AGGRE	GATE AMOUNT BENEFICIALLY OWNED BY EACH REPORTING PERSON		
	242,500 - (See Schedule Item 4 incorporated by reference)		
	IF THE AGGREGATE AMOUNT IN ROW (9) EXCLUDES CERTAIN SHARES*		
	-		
11 PERCE	NT OF CLASS REPRESENTED BY AMOUNT IN ROW 9		
	5.2%		
12 TYPE	OF REPORTING PERSON*		
	IN		
	AGD TVORDVOTTON DEPOND DIVINO OVEL		
	*SEE INSTRUCTION BEFORE FILLING OUT!		
CUSIP NO. 7748	30103 SCHEDULE 13G Page 5 of 7 Pages		
ITEM 1 (a).	NAME OF ISSUER: Rocky Shoes and Boots Inc.		
ITEM 1 (b).	ADDRESS OF ISSUER'S PRINCIPAL EXECUTIVE OFFICES: 39 East Canal St. Nelsonville, OH 45764		
ITEM 2 (c).	NAME OF PERSON FILING: Kern Capital Management, LLC ("KCM"), Robert E. Kern Jr.(R. Kern) and David G. Kern (D. Kern). R. Kern, D. Kern are Principals and controlling members of KCM.		
ITEM 2 (b).	ADDRESS OR PRINCIPAL BUSINESS OFFICE OR, IF NONE, RESIDENCE: The address of the principal business office of each reporting person is: 114 West 47th Street, Suite 1926, New York, NY 10036.		
ITEM 2 (c).	CITIZENSHIP: Reference is made to Item 4 of each of the cover page of this Schedule, which Items are incorporated by reference herein.		
ITEM 2 (d).	TITLE OF CLASS OF SECURITIES: Common Stock		
ITEM 2 (e).	CUSIP NUMBER: 774830103		
ITEM 3 (e)	THE PERSONS FILING THIS SCHEDULE, PURSUANT TO PARAGRAPH 240.13d-1(b) ARE A: (X) Investment Advisor registered under section 203 of the Investment Advisors Act of 1940.		

ITEM 4.

Reference is made to Items 5-9 and 11 of cover pages which Items are incorporated by reference herein.

R. Kern and D. Kern as controlling members of KCM may be deemed the beneficial owner of the securities of the company owned by KCM as of December 31, 2004 in that they might be deemed to share the power to direct the voting or disposition of the securities. Neither the filing of this Schedule nor any of its contents shall be deemed to constitute an admission that either R. Kern or D. Kern is, for any purpose, the beneficial owner of any such securities to which this Schedule relates, and such beneficial ownership is expressly denied.

CUSIP NO. 774830103

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ITEM 5. OWNERSHIP OF MORE THAN FIVE PERCENT OR LESS OF A CLASS: If this statement is being filed to report the fact that as of the date here of the reporting person has ceased to be the beneficial owner of more than five percent of the class of securities, check the following $\ensuremath{/}$ /.

Not applicable.

- ITEM 6. OWNERSHIP OF MORE THAN FIVE PERCENT ON BEHALF OF ANOTHER PERSON: The shares reported are held in institutional accounts for the economic benefit of the beneficiaries of those accounts.
- 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.
- NOTICE OF DISSOLUTION OF GROUP: TTEM 9. Not applicable.
- ITEM 10. CERTIFICATION:

BY SIGNING BELOW I CERTIFY THAT, TO THE BEST OF MY KNOWLEDGE AND BELIEF, THE SECURITIES REFERRED TO ABOVE WERE ACQUIRED AND ARE HELD IN THE ORDINARY COURSE OF BUSINESS AND WERE NOT ACQUIRED AND ARE NOT HELD FOR THE PURPOSE OF OR WITH THE EFFECT OF CHANGING OR INFLUENCING THE CONTROL OF THE ISSUER OF SUCH THE SECURITIES AND WERE NOT ACQUIRED AND ARE NOT HELD IN CONNECTION WITH OR AS A PARTICIPANT IN ANY TRANSACTION HAVING SUCH PURPOSES OR EFFECT.

SIGNATURE:

AFTER REASONABLE INQUIRY AND TO THE BEST OF MY KNOWLEDGE AND BELIEF, I CERTIFY THAT THE INFORMATION SET FORTH IN THIS STATEMENT IS TRUE, COMPLETE AND CORRECT.

February 14, 2005 _ -----DATED

/s/ John J. Crimmins

By: _____ John J. Crimmins Senior Vice President

Chief Financial & Operations Officer Kern Capital Management LLC

/s/ Robert E. Kern Jr. Bv: -----Robert E. Kern Jr.

/s/ David G. Kern By:

David G. Kern

EXHIBIT 1

AGREEMENT AS TO JOINT FILING OF SCHEDULE 13G

This agreement is made pursuant to Rule 13d-1(f)(1) under the Securities and Exchange Act of 1934, as amended (the "Act"), by and among the parties listed below, each referred to herein as "Joint Filer". The Joint Filers agree that a statement of beneficial ownership as required by Section 13(d) of the Act and the Rules thereunder may be filed on each of their behalf on Schedule 13G and that said joint filing may thereafter be amended by further joint filings. The Joint Filers state that they each satisfy the requirements for making a joint filing under rule 13d-1.

February 14, 2005	By:	/s/ John J. Crimmins	
DATED	ъу.	John J. Crimmins Senior Vice President Chief Financial & Operations Officer Kern Capital Management LLC	
	D	/s/ Robert E. Kern Jr.	
	Ву: -	Robert E. Kern Jr.	
	Drva	/s/ David G. Kern	
	Ву:	David G. Kern	