

Mail Stop 4561

October 18, 2007

VIA U.S. MAIL

Lee Horwitz
CFO
Morgan Stanley Charter Graham L.P.
Demeter Management Corporation
522 Fifth Avenue, 13th Floor
New York, NY 10036

**Re: Morgan Stanley Charter Graham L.P.
Form 10-K for Fiscal Year Ended
December 31, 2006
Filed March 9, 2007
File No. 000-25603**

Dear Mr. Horwitz:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Kevin Woody
Branch Chief