

November 17, 2006

Mail Stop 4561

*By U.S. Mail and facsimile to (704) 386-4579*

Mr. Alvaro G. de Molina  
Chief Financial Officer  
Bank of America Corporation  
100 N. Tryon Street  
Charlotte, NC 28255

**Re: Bank of America Corporation  
Form 10-K for the Fiscal Year Ended December 31, 2005  
Forms 10-Q for Fiscal Quarters Ended  
March 31, 2006 and June 30, 2006  
File No. 1-06523**

Dear Mr. de Molina:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

John P. Nolan  
Accounting Branch Chief