

Mail Stop 4561

July 23, 2007

VIA U.S. MAIL AND FAX (516) 869-7250

Michael Pappagallo
Executive Vice President and Chief Financial Officer
Kimco Realty Corporation
3333 New Hyde Park Road
New Hyde Park, NY 11042

**Re: Kimco Realty Corporation
Form 10-K for Fiscal Year Ended
December 31, 2006
Filed February 28, 2007
Form 10-Q for Quarterly Period Ended
March 31, 2007
Filed May 8, 2007
File No. 1-10899**

Dear Mr. Pappagallo:

We have reviewed your response letter dated July 20, 2007 and have the following additional comment. If you disagree with our comment, we will consider your explanation as to why our comment is not applicable. Please be as detailed as necessary in your explanation.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comment or on any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

Michael Pappagallo
Kimco Realty Corporation
July 23, 2007
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Form 10-K for the year ended December 31, 2006

Financial Statements

Consolidated Statements of Income, page 72

1. We have reviewed your response to our prior comment number one. Please tell us management's basis for determining that the line item revenues from rental property less rental property expenses does not violate Item 10(e)(1)(ii)(C).

Please respond to our comment within 10 business days or tell us when you will provide us with a response. Please file your response letter on EDGAR. You may contact Jennifer Monick, Staff Accountant at (202) 551-3295, or the undersigned at (202) 551-3629 if you have questions.

Sincerely,

Kevin Woody
Branch Chief