

August 4, 2009

Via U.S. Mail and Facsimile (216-357-6515)

Daniel R. Stolzer  
Vice President, Deputy General Counsel, and Assistant Secretary  
KeyCorp  
127 Public Square  
Cleveland, Ohio 44114

**Re: KeyCorp  
Form 10-K for the Fiscal Year Ended December 31, 2008  
Filed February 27, 2009  
File No. 1-11302  
Response Letters Dated July 3, 2009 and July 28, 2009**

Dear Mr. Stolzer:

We refer you to our comment letters dated June 25, 2009 and July 16, 2009 regarding business contacts with Iran. We have completed our review of this subject matter and have no further comments at this time.

Sincerely,

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Todd Schiffman  
Assistant Director  
Division of Corporation Finance