January 6, 2009

Via U.S. Mail and Facsimile

Mr. Howard C. Naphtali Chief Financial Officer Investment Technology Group, Inc. 380 Madison Avenue New York, NY 10017

> Re: Investment Technology Group, Inc. Form 10-K for the fiscal year ended December 31, 2007 Filed February 29, 2008 File No. 001-32722

Dear Mr. Naphtali:

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

Sincerely,

Tom Kluck Legal Branch Chief