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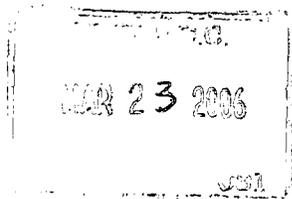
SE Arca, Inc. | 100 S. Wacker Drive | Suite 1500
Chicago, Illinois 60606
T 312.442.7887 | F 312.442.7778

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VIA FACSIMILE AND U.S. MAIL

March 23, 2006



Mr. Brian Johnson, Branch Chief
Branch of Filer Support 2, Mailstop 1-4
Securities and Exchange Commission
450 Fifth Street, N.W., Room #1004
Washington, D.C. 20549

Re: Ecolab, Inc.
Supplemental Listing of Preferred Stock Purchase Rights, no par value

Dear Mr. Johnson:

Please be advised that NYSE Arca Equities, Inc. ("NYSE Arca") has received (on March 20, 2006) an application from the above-referenced issuer and has approved the above-referenced security for listing on NYSE Arca, Inc. ("Exchange"). The Exchange requests acceleration of registration of the security under the Securities Exchange Act of 1934.

Please acknowledge receipt of this letter by stamping the enclosed copy with the date received and returning it in the post-paid self-addressed envelope.

If there are any questions, please call me at (312) 442-7833 or at lderner@nyse.com. Your assistance is greatly appreciated.

Sincerely,

Lisa Derner
Senior Equities Analyst, Equity Qualification

PROCESSED

MAR 27 2006

THOMSON
FINANCIAL

Enclosure

cc: Mr. Timothy P. Dordell, Ecolab, Inc., 370 Wabasha Street N, St. Paul, MN 55102