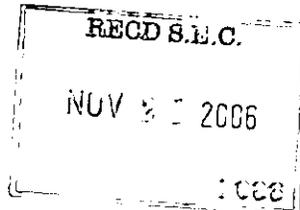


Director
Securities Operations



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CERTINYS

November 21, 2006

Mr. Brian Johnson
Branch Chief
Securities and Exchange Commission
Branch of Filer Support 2
Room 2531
100 F Street, NE
Washington, DC 20549

PROCESSED

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THOMSON
FINANCIAL

Dear Mr. Johnson:

The New York Stock Exchange certifies approval for listing and registration under the Securities Exchange Act of 1934, KeyCorp Capital IX, Trust Preferred Securities, Junior Subordinated Debentures of KeyCorp and KeyCorp Guarantee with respect to Trust Preferred Securities of KeyCorp Capital IX (application for the Junior Subordinated Debentures of KeyCorp and Keycorp Guarantee with respect to Trust Preferred Securities of KeyCorp Capital IX is made for listing not for trading, but only in connection with the registration of Trust Preferred Securities pursuant to the requirements of the Securities and Exchange Commission) and requests immediate acceleration of registration. Adequate distribution assured. Form 8-A received on November 21, 2006. Tentative listing date – Not yet determined.

Sincerely,