cik
1170593

Director
Securities Operations

NYSE Group, Inc. | 20 Broad Street
New York, New York 10005
t 212.656.5026 | f 212.656.5893
pmadho@nyse.com

NYSE Group

07030014

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January 5, 2007

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

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JAN 11 2007
THOMSON
FINANCIAL

Dear Mr. Johnson:

The New York Stock Exchange certifies approval for listing and registration under the Securities Exchange Act of 1934, Primus Guaranty, Ltd., 7% Senior Notes due 2036 and requests immediate acceleration of registration. Adequate distribution assured. Form 8-A received on January 5, 2007. Tentative listing date – January 9, 2007.

Sincerely,