



1-33742

American Stock Exchange  
86 Trinity Place  
New York, New York 10006-1872

CERT Amx

October 16, 2007

Ms. Cecile Peters  
Chief, IT Services  
Division of Corporate Finance  
Securities and Exchange Commission  
100 F Street, NE  
Washington, D.C. 20549

Dear Ms. Peters:

This is to certify that on October 12, 2007 the American Stock Exchange LLC (the "Exchange") received from SPA ETF Trust (the "Registrant") a copy of the Registrant's application on Form 8-A for the registration of the following securities:

Shares of beneficial interest, no par value, of the following investment portfolios:

SPA MarketGrader 40 Fund  
SPA MarketGrader 100 Fund  
SPA MarketGrader 200 Fund  
SPA MarketGrader Small Cap 100 Fund  
SPA MarketGrader Mid Cap 100 Fund  
SPA MarketGrader Large Cap 100 Fund

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We further certify that the above described securities have been approved by the Exchange for listing and registration. We understand that the Registrant is seeking immediate acceleration of the effective date of registration, and we hereby join in such request.

Sincerely,

A handwritten signature in cursive script that reads "Bryan Fischer".

Bryan Fischer  
Managing Director  
Listing Qualifications Department

cc: Herbert Scholl

