

NYSE Regulation

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VIA FACSIMILE AND U.S. MAIL

September 28, 2007

Ms. Velma Smith, 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

RECEIVED
SEP 28 2007
The Division of
Investment Management

Re: TDAX Funds, Inc.—Original Listing

Dear Ms. Smith:

Please be advised that NYSE Regulation, Inc. has received (on September 21, 2007) an application from the above-referenced issuer and has approved the following securities for listing on NYSE Arca, Inc. ("Exchange"):

- TDAX Independence 2010 Exchange-Traded Fund
- TDAX Independence 2020 Exchange-Traded Fund
- TDAX Independence 2030 Exchange-Traded Fund
- TDAX Independence 2040 Exchange-Traded Fund
- TDAX Independence In-Target Exchange-Traded Fund

The Exchange requests acceleration of registration of these securities 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 self-addressed envelope. If there are any questions, please call me at (312) 442-7832. Your assistance is greatly appreciated.

Sincerely,

Craig A. Gray
Craig A. Gray
Lead Analyst—Listing Compliance

PROCESSED

B **OCT 02 2007**
THOMSON FINANCIAL

Enclosure

cc: Brian F. Hurley, Esq., Paul, Hastings, Janofsky & Walker LLP, 75 East 55th Street,
New York, New York 10022



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END