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UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549
FORM 19b-4(e)

Information Required of a Self-Regulatory Organization Listing and Trading a New
Derivative Securities Product Pursuant to Rule 19b-4(e) Under the Securities Exchange Act of 1934
READ ALL INSTRUCTIONS PRIOR TO COMPLETING FORM

Part I Initial Listing Report

1. Name of Self-Regulatory Organization Listing New Derivative Securities Product:

NYSE Arca, Inc.

2. Type of Issuer of New Derivative Securities Product (e.g., clearinghouse, broker-dealer, corporation, etc.):

Corporation

3. Class of New Derivative Securities Product:

Index-Linked Securities

4. Name of Underlying Instrument:

Lehman Brothers Commodity Index Pure Beta Total Return

5. If Underlying Instrument is an Index, State Whether it is Broad-Based or Narrow-Based:

Broad-Based

6. Ticker Symbol(s) of New Derivative Securities Product:

RAW

7. Market or Markets Upon Which Securities Comprising Underlying Instrument Trades:

Chicago Mercantile Exchange, COMEX, NYMEX, London Metals Exchange, Inter Continental Exchange (ICE)

8. Settlement Methodology of New Derivative Securities Product:

Regular way trades settle on T+3/Book entry only held in DTC.

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9. Position Limits of New Derivative Securities Product (if applicable):

Not applicable.

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Part II Execution

The undersigned represents that the governing body of the above-referenced Self-Regulatory Organization has duly approved, or has duly delegated its approval to the undersigned for, the listing and trading of the above-referenced new derivative securities product according to its relevant trading rules, procedures, surveillance programs and listing standards.

Name of Official Responsible for Form:

Mary Yeager

Title:

Corporate Secretary

Telephone Number:

(212) 656-2062

Manual Signature of Official Responsible for Form:

Mary Yeager
June 3, 2008
SEC 2449 (1/99)

Act	Securities Exchange Act of 1934
Section	19b-4
Rule	19b-4(e)
Public	JUN - 4 2008
Availability:	

Mary Yeager
Corporate Secretary



NYSE Arca, Inc.
11 Wall Street
New York, NY 10005

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tel: 212.656.2062
212.656.3939
myeager@nyse.com

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Via Overnight Mail

June 3, 2008

Ms. Gail Jackson
US Securities and Exchange Commission
Division of Market Regulation
Station Place – Building I
100 F Street, N.E. – Room 6628
Washington, DC 20549

Re: Form 19b-4(e) – Lehman Brothers Holdings Inc.

Dear Ms. Jackson:

Enclosed for filing pursuant to Section 19(b) of the Securities Exchange Act of 1934 and Rule 19b-4 thereunder, please find an original and nine copies of Form 19b-4(e) with respect to the following securities:

- Lehman Brothers Holdings Inc., Opta Exchange-Traded Notes Linked to the Lehman Brothers Commodity Index Pure Beta Total Return due February 25, 2038 (Ticker Symbol RAW); and
- Lehman Brothers Holdings Inc., Opta Exchange-Traded Notes Linked to the Lehman Brothers Commodity Index Agriculture Pure Beta Total Return due February 25, 2038 (Ticker Symbol EOH).

If you have any questions, please do not hesitate to call me at (212) 656-2062.

Sincerely,



Enclosures

Cc: Tim Malinowski (NYSE Euronext)

Act	Securities Exchange Act of 1934
Section	19b-4
Rule	19b-4(e)
Public Availability:	JUN - 4 2008

END