



NYSE Regulation

Washington, DC 20549

NOV 21 2008

**VIA FACSIMILE AND U.S. MAIL**

November 21, 2008

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

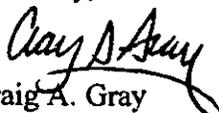
Re: Citigroup Funding, Inc.

Dear Ms. Smith:

Please be advised that NYSE Regulation, Inc. has received (on November 19, 2008) an application from the above-referenced issuer and has approved the securities detailed on attached Exhibit A for listing on NYSE Arca, Inc. ("Exchange").

The Exchange requests acceleration of registration of these securities under the Securities Exchange Act of 1934. If there are any questions, please call me at (312) 442-7832. Your assistance is greatly appreciated.

Sincerely,



Craig A. Gray
Manager, Listing Compliance

Enclosure

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001-32544

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EXHIBIT A
Citigroup Funding, Inc.
Issues Listing on NYSE Arca, Inc.

S&P 500 Index Buffer Notes due March 5, 2010
Financial Select Sector SPDR Fund Buffer Notes due March 4, 2010
S&P 500 Index Buffer Notes due February 4, 2010
Dow Jones Industrial Average Buffer Notes due May 7, 2010
iShares MSCI Emerging Markets Index Fund Buffer Notes due May 7, 2010
Financial Select Sector SPDR Fund Buffer Notes due April 8, 2010
Citi U.S. Equity Model Index Strategic Market Access Notes due May 25, 2010
10% Schlumberger Ltd. ELKS due June 5, 2009
13.5% JC Penney Company, Inc ELKS due July 9, 2009
14% Morgan Stanley ELKS due December 4, 2008
10% Merck & Co. ELKS due April 29, 2009
11.75% Deere & Co. ELKS due April 6, 2009
10.5% AT&T Inc. ELKS due February 5, 2009
13.5% Amazon.com, Inc. ELKS due July 9, 2009
14% Research In Motion Ltd. ELKS due June 5, 2009
11% Celgene Corp. ELKS due April 6, 2009
8.5% Microsoft Corporation ELKS due September 4, 2009
10.5% Intel Corporation ELKS due May 7, 2009
10% Federal National Mortgage Association ELKS due January 1, 2009
10.5% Oracle Corporation ELKS due January 8, 2009
10.5% EMC Corp. ELKS due February 5, 2009
8% Exxon Mobil Corp. ELKS due September 4, 2009
11.5% NYSE Euronext ELKS due March 5, 2009
11.5% Nokia Corporation ADRs ELKS due August 6, 2009
9% ELKS Cisco Systems, Inc. ELKS due August 6, 2009
10.75% Valero Energy Corp. ELKS due May 7, 2009
12% International Game Technology ELKS due August 6, 2009
12.5% Alcoa Inc. ELKS due December 4, 2008
8.5% Exxon Mobil Corp. ELKS due March 25, 2009
9.75% Archer Daniels Midland Co. ELKS due January 8, 2009
13.5% Apple Inc. ELKS due March 6, 2009
9% Time Warner Inc. ELKS due March 6, 2009
US-EUR-JAP Basket LASERS due February 25, 2010
S&P 500 Index LASERS due January 27, 2010
eBay Inc. PACERS due November 26, 2008
10% Companhia Vale do Rio Doce ADRs PACERS due August 11, 2009
CBOE S&P 500 BuyWrite Index PISTONS due September 23, 2010
S&P 100 Index PPN due April 29, 2010
Nikkei 225 Index PPN due May 29, 2009
Russell 1000 Growth Index PPN due March 2, 2009
MSCI EAFE Index PPN due December 7, 2009
DJIA PPN due January 25, 2010
eBay Inc. PACERS due June 2, 2009
S&P 500 Index PPN due December 30, 2008

Citigroup Funding, Inc.
Exhibit A, continued

US-EUR-JAP Basket SMUN due February 4, 2009
S&P 500 Index SMUN due December 4, 2008
Dow Jones EURO STOXX 50 Index SMUN due February 6, 2009
MSCI EAFE Index Stock Market Upturn Notes due September 4, 2009
S&P 500 Index SMUN due October 6, 2009
S&P 500 Index SMUN due May 7, 2009
Nikkei 225 Index SMUN due December 4, 2008

END