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VIA FACSIMILE AND U.S. MAIL

February 4, 2009

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 SEC

FEB 04 2009

Washington, DC 20549

Re: Bank of America Corporation
 Issuer CIK: 0000070858
 Issuer File Number: 001-06523
 Form 8-A Date: 2/3/2009

001-06523
 CERT PAC

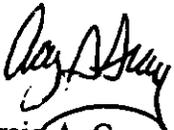
Dear Ms. Smith:

Please be advised that NYSE Regulation, Inc. has received (on February 2, 2009) an application from the above-referenced issuer and has approved the following security for listing on NYSE Arca, Inc. ("Exchange"):

Strategic Accelerated Redemption Securities, Linked to the S&P 500 Index,
 due February 1, 2011

The Exchange requests acceleration of registration of this security 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

PROCESSED

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END