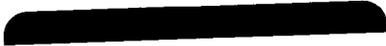




Received SEC
JUN 18 2009
Washington, DC 20549

Edwin Mecabe
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June 18, 2009

*CEC/NYS
001-32307*

Ms. Velma T. Smith
Branch Chief
Securities and Exchange Commission
Branch of Filer Support 2
Room 2531
100 F Street, NE
Washington, DC 20549

Dear Ms. Smith:

The New York Stock Exchange certifies approval for listing and registration under the Securities Exchange Act of 1934, Primus Guaranty, Ltd., Preferred Share Purchase Rights and requests immediate acceleration of registration. Adequate distribution assured. Form 8-A received on May 29, 2009.

Sincerely,