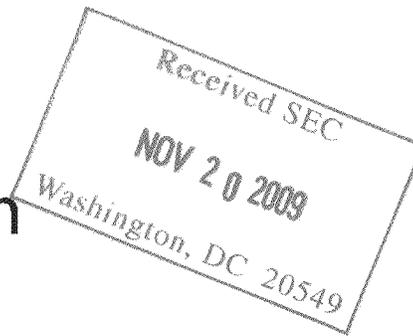


NYSE Regulation



NYSE Regulation, Inc. | 20 Broad Street
New York, New York 10005
nyseregulation.com

November 20, 2009



CERTPAC
001-32544

Ms. Velma Smith, Branch Chief
Securities and Exchange Commission
Division of Corporation Finance – Filer Support Office
100 F Street, N.W., Mail Stop 3040
Washington, D.C. 20549

Re: Amended Certification
Citigroup Funding Inc.—Original Listing
CIK: 0001318281
Filer: 001-32544
Filing: 8-A12B filed November 19, 2009

Dear Ms. Smith:

Please be advised that NYSE Regulation, Inc. has received (on November 18, 2009) an application from the above-referenced issuer and has approved the following securities for listing on NYSE Arca, Inc. (“Exchange”):

**Equity LinKed Securities (ELKS®)
Based Upon the Common Stock of Bank of America Corporation Due 2010**

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 (212) 656-4632. Your assistance is greatly appreciated.

Sincerely,

Clinton Clark
Analyst, Corporate Compliance