

August 10, 2007

Nancy M. Morris  
Secretary  
U.S. Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

**Re: File Nos. 4-533 and 4-534**

Dear Ms. Morris:

E\*TRADE Financial Corporation ("E\*TRADE") is pleased to provide comments in connection with the two plans currently before the Commission regarding the selection, reservation and use of ticker symbols by exchanges. E\*TRADE strongly supports the proposal put forth by Nasdaq and several other exchanges (the "Five Characters Plan") as one that enhances competition among markets and reduces the potential for investor confusion. E\*TRADE's views on this proposal have been formed by both its own experiences related to symbology when transferring our own security listing from the New York Stock Exchange to Nasdaq, and its knowledge of the needs of individual investors who comprise our customer base.

In December 2006, E\*TRADE transferred its listing to from the New York Stock Exchange to Nasdaq, and as a result was forced to change its symbol from "ET" to "ETFC". The prospect of making this change was a negative factor considered in our analysis regarding whether to transfer the listing, simply because of the confusion it would cause our many small investors who had come to identify us with this symbol.\* Accordingly, E\*TRADE expended time and resources to ensure that our investors were aware not only of the change of listing market, but also the accompanying symbol change. E\*TRADE thus believes that companies should not be forced to change their symbol simply because they choose to list on Nasdaq, and any artificial restrictions on symbol use among registered exchanges places an inappropriate and unnecessary burden on issuers as they decide where to list their company's stock, and on their investors that would benefit from symbol continuity. Like with cellular telephone numbers, restraints on symbol portability only benefit entrenched competitors, not public companies or their investors.

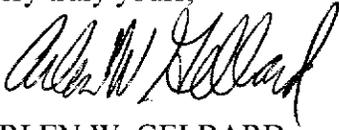
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\* This hesitation did not, however, in any way relate to whether moving to a four-letter symbol would be regarded as a change in company quality in the marketplace. As a sophisticated financial company, E\*TRADE is well aware that many of the world's great companies are listed on NASDAQ with four-letter symbols, and see no evidence that investors make no differentiation of company quality based on the length of their ticker symbol.

Accordingly the Five Characters Plan, with a fair framework for symbol portability and a generally level playing field for all exchange participants, will ultimately result in greater choice for public companies and less confusion for investors, and E\*TRADE urges its swift approval by the Commission.

We appreciate the opportunity to discuss our views with the Commission and are thankful that it has taken the initiative to create a symbology process that is fair, transparent and focuses on the needs of public investors.

Very truly yours,

A handwritten signature in black ink, appearing to read "Arlen W. Gelbard". The signature is fluid and cursive, with a large initial "A" and "G".

ARLEN W. GELBARD  
*Chief Administrative Officer  
and General Counsel*