

HALLIBURTON

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July 2, 2018

Via e-mail (rule-comments@sec.gov)

Mr. Brent J. Fields
Secretary
U.S. Securities and Exchange Commission
100 F Street NE
Washington, D.C. 20549

Re: File No. S7-05-18
Transaction Fee Pilot for NMS Stocks, Securities Exchange Act Release No. 82873
(March 14, 2018), 83 FR 13008 (March 26, 2018)

Dear Mr. Fields:

We are writing about the proposal of the Securities and Exchange Commission to adopt a Transaction Fee Pilot under Proposed Rule 610T of Regulation NMS (the "Pilot").

As an NYSE listed company, Halliburton has received a copy of the comment letter submitted by Elizabeth K. King, General Counsel and Corporate Secretary, NYSE Group, Inc., dated May 31, 2018 (the "NYSE Submission"). The NYSE Submission sets forth a number of objections with respect to the Pilot and specifically identifies potentially adverse impacts of the Pilot on issuers of equity securities and investors. These negative impacts could include, among others, wider bid-ask spreads for issuers in a Pilot test group as compared to a control group (or other Pilot test groups), which would result in higher costs for those issuers carrying out certain transactions, such as a share repurchase program, and which would otherwise disadvantage some issuers by reducing the appeal of their equity securities to investors due to higher investor transaction costs.

As we share similar concerns to those described in the NYSE Submission, as well as those expressed in other comment letters submitted by issuers in opposition to the implementation of the Pilot, we would encourage you to consider thoughtfully the objections raised by the NYSE, and in particular the potential negative impacts of the Pilot on issuers of equity securities placed in a Pilot test group and investors in those securities. We respectfully request that, if the Pilot is implemented over the objections submitted to you, the common stock of Halliburton Company be excluded from each of the three Pilot test groups and instead be included within the control group.

Respectfully submitted,



Christopher T. Weber
Executive Vice President and
Chief Financial Officer

Mr. Brent J. Fields

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Honorable Jay Clayton, Chairman

Honorable Michael S. Piwowar, Commissioner

Honorable Kara M. Stein, Commissioner

Honorable Robert J. Jackson Jr., Commissioner

Honorable Hester M. Peirce, Commissioner

Brett Redfearn, Director, Division of Trading and Markets