

**National City**

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July 28, 2008

**Peter E. Raskind**  
 Chairman, President  
 and Chief Executive Officer

Via fax 202-772-9200

The Honorable Christopher Cox  
 Chairman  
 Mail Stop 1070  
 U.S. Securities and Exchange Commission  
 100 F. Street, N.E.  
 Washington, DC 20549

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 CHAIRMAN'S  
 CORRESPONDENCE UNIT

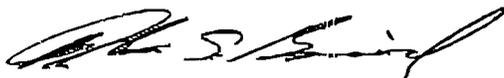
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Dear Chairman Cox:

Following my letter of July 18, 2008, I would like to reiterate National City's view that the Commission's recent initiatives to address abusive trading practices in the marketplace are a step in the right direction. That said, we believe that the Commission's July 15, 2008 emergency order with respect to naked short selling in the securities of certain specified financial institutions should be both extended and expanded to cover National City and similarly situated financial institutions. In our opinion, National City and other banking institutions not covered by the order have been more severely harmed by false rumors and abusive short selling than many of the covered institutions that have been subject to the practices described by the Commission as the basis for the emergency order.

We respectfully urge the Commission to extend and expand the scope of the order, both because the trading in securities of National City and other excluded financial institutions pose at least as great a threat to the stability of the markets as that of many of the firms included under the order, and because, to the extent government financial exposure is a driving factor, these financial institutions are also partially backed by the government through the FDIC and other channels.

Sincerely,



Peter E. Raskind

cc: Ben S. Bernanke, Chairman, Board of Governors, Federal Reserve System  
 Erik R. Sikki, Director, Division of Trading and Markets (via fax 202-772-9273)  
 Daniel M. Gallagher, Counsel to the Chairman (via fax 202-772-9200)  
 Michael S. Solender, Chief Legal Officer (via fax 202-772-9200)  
 John C. Dugan, Comptroller of the Currency  
 Sandra Pianalto, President & CEO, Federal Reserve Bank of Cleveland