

**From:** Ed Moore [EMoore@rpminc.com]  
**Sent:** Thursday, March 29, 2007 10:54 AM  
**To:** CHAIRMANOFFICE  
**Cc:** Noreen Culhane, Executive Vice President, NYSE Group, Inc.  
**Subject:** Exchange Symbology Plan

Dear Chairman Cox and Commissioners Atkins, Campos, Nazareth and Casey,

I'm writing on behalf of RPM International Inc., a New York Stock Exchange-listed company with common stock trading under the ticker symbol RPM. We have been notified by the NYSE that NASDAQ began trading Delta Financial Corporation under the ticker symbol DFC. Apparently DFC was this issuer's ticker symbol when it was listed on the American Stock Exchange.

Having an issuer with a three-letter ticker symbol is new for NASDAQ. Indeed, RPM International used to trade on NASDAQ under the symbol RPOW before moving to the NYSE in 1998. Because of the growing number of markets and companies in the stock trading industry, we applaud the efforts that were undertaken by the Exchanges to enter into a Symbology Plan among those involved in this industry. We believe, as does the NYSE, that a Symbology Plan will improve existing allocation practices for the selection and utilization of ticker symbols for listed securities.

We also believe that the unilateral action by NASDAQ to assign a three-letter ticker symbol circumvents the ongoing work on a Symbology Plan. Because of the importance of the brand distinction attached to a company's ticker symbol, we would like the SEC to encourage NASDAQ to refrain from issuing one-, two- or three- letter ticker symbols until work on the Symbology Plan is complete.

We are somewhat surprised at the NASDAQ action given the following answer to a frequently asked question that was posted on the NASDAQ website on March 1, 2007:

"Will NASDAQ-listed companies be able to switch their current symbols to 1-, 2- or 3- letter symbols?"

"NASDAQ will consider all requests by issuers to change symbols, as we do today. This would include the ability to change to a 1-, 2- or 3-character symbol. NASDAQ continues to work with the SEC and other exchanges to develop the Exchange Symbology Plan. Once the plan is in place, NASDAQ intends to process symbol change requests from existing NASDAQ-listed issuers that wish to move to shorter issue symbols. While NASDAQ will consider all requests by issuers to change symbols, NASDAQ must consider all factors, including the guidelines of the Exchange Symbology Plan, when making its decision as to whether an issuer

will be granted a different symbol."

Thank you for your attention to this matter.

Very truly yours,

Edward W. Moore

Vice President, General Counsel & Secretary RPM International Inc.

2628 Pearl Road

P.O. Box 777

Medina, Ohio 44258

Phone: 330-273-8874

Fax: 330-225-6574

E-mail: [emoore@rpm-inc.com](mailto:emoore@rpm-inc.com)

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