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May 22, 2024

Vanessa Countryman, Secretary  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-1090

**Re: MIAX SAPPHIRE, LLC – Amendment No. 1 to the Form 1 Application for Registration as a National Securities Exchange Pursuant to Section 6 of the Securities Exchange Act of 1934**

Dear Ms. Countryman:

Attached for official filing please find Amendment No. 1 to MIAX Sapphire, LLC's ("MIAX Sapphire") Form 1 Application seeking registration as a national securities exchange pursuant to Section 6 of the Securities Exchange Act of 1934.

This Amendment reflects the updates to the Form 1 as discussed with Commission staff, including an updated Exhibit B. Please note that no other Exhibits have been changed since the initial filing of the MIAX Sapphire Form 1 Application on September 26, 2023.

Please contact me directly if you have any questions regarding any aspect of this application.

Very truly yours,

Gregory P. Ziegler  
Vice President, Senior Counsel

cc: Haoxiang Zhu, Director, Division of Trading and Markets, SEC  
Richard R. Holley III, Assistant Director, Division of Trading and Markets, SEC

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Lauren Yates, Senior Special Counsel, Division of Trading and Markets, SEC  
Thomas P. Gallagher, Chief Executive Officer, MIAX  
Barbara Comly, Executive Vice President, General Counsel, MIAX