

BRUNELLE & HADJIKOW

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

40 BROAD STREET, 18TH FLOOR

NEW YORK, NY 10004

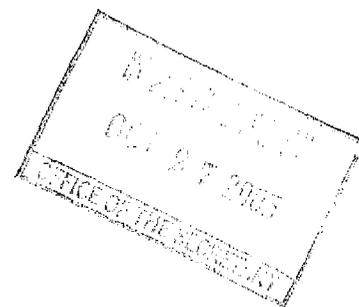
GEORGE BRUNELLE
ANNA HADJIKOW
IRWIN WELTZ
JAMES A. MOORE, JR.
TIMOTHY P. KEBBE

TEL (212) 809-9100
FAX (212) 809-3219

October 25, 2005

FEDERAL EXPRESS

Mr. Jonathan G. Katz
Secretary
Securities and Exchange Commission
100 F. Street, NE
Washington, D.C. 20549-9303



Re: SR-NYSE-2005-63 - 2
Proposed NYSE Rule Amendment
Registered Competitive Market Makers

Dear Mr. Katz:

We represent the firm of Alan L. Sarroff LLC ("ALS"), an NYSE member organization engaged in business as a Registered Competitive Market Maker ("RCMM") on the Floor of the NYSE.

We have just reviewed SEC Release No. 34-52648 (October 21, 2005), permitting the NYSE to impose a moratorium on the registration of new RCMMs, while the NYSE studies the viability of that business. Page 4, Section "C" of the Release states that, "The Exchange has neither solicited nor received written comments on the proposed Rule change."

This is untrue. Our office provided written comments on the moratorium issue to both the NYSE and the SEC on October 6, 2005, requesting a full period of public comment prior to any moratorium. Previously, on June 20, 2005, we provided a substantive submission to the NYSE on the RCMM business in general, and a copy of that submission accompanied our October 6 letter to the SEC. Neither agency has made any reference to our submissions.

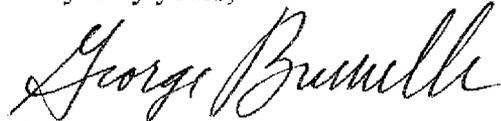
We would appreciate an explanation. In addition, we have been asked to submit further comments on this issue to the SEC, and we would appreciate the SEC's assurances that our comments will be considered.

BRUNELLE & HADJIKOW
A PROFESSIONAL CORPORATION

Mr. Jonathan G. Katz
October 25, 2005
Page 2

Thank you.

Very truly yours,

A handwritten signature in cursive script that reads "George Brunelle". The signature is written in black ink and is positioned above the printed name.

George Brunelle