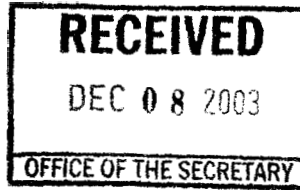




*Spear, Leeds
& Kellogg*

#1



November 21, 2003

Jonathan G. Katz
Secretary
Securities and Exchange Commission
450 Fifth Street NW
Washington, D.C. 20549-0609

Re: File No. SR-PCX-2003-46; Release No. 34-48598

Dear Mr. Katz:

Spear, Leeds & Kellogg, L.P. ("SLK") appreciates the opportunity to comment on The Pacific Exchange, Inc.'s ("PCX") proposal to amend its rules governing the Archipelago Exchange ("ArcaEx") to offer an identity order feature to ArcaEx's Equities Trading Permit Holders ("ETP Holders"). SLK supports, and urges the Securities and Exchange Commission ("Commission") to approve, PCX's proposal.

Providing ETP Holders with the ability to display their identity on an order-by-order basis will provide more visibility to those ETP Holders that choose to disclose their interest in a particular security. ETP Holders have requested the identity order feature as a way of achieving this visibility in an electronic venue such as ArcaEx. We believe that disclosure on an attributed basis of trading interest adds to market transparency in general and, accordingly, is consistent with a key National Market System goal.

We note that the identity order feature will afford ETP Holders the elective ability to trade on ArcaEx on an attributed or anonymous basis, similar to the ability of participants in The Nasdaq Stock Market, Inc.'s SuperMontage to trade on an attributed basis using their own MPID or on an anonymous basis using the SIZE feature.

* * * * *
** * ** *



*Spear, Leeds
& Kellogg*

Jonathan G. Katz
Secretary
November 21, 2003
Page 2

SLK appreciates the opportunity *to* comment on PCX's proposal to offer the identity order feature to its ETP Holders and respectfully requests that the Commission approve the rule change as proposed. Please call me at (212) 433-5664 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Duncan L. Niederauer', written over a horizontal line.

Duncan L. Niederauer
Managing Director and
Co-Chief Executive Officer

cc: William H. Donaldson, Chairman
Paul S. Atkins, Commissioner
Roel C. Campos, Commissioner
Cynthia A. Glassman, Commissioner
Harvey J. Goldschmid, Commissioner
Annette L. Nazareth, Director, Division of Market Regulation
Robert L.D. Colby, Deputy Director, Division of Market Regulation
Katherine England, Assistant Director, Division of Market Regulation
John Polise, Assistant Director, Division of Market Regulation
Ian Patel, Attorney-Adviser, Division of Market Regulation