



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

March 14, 2007

Mr. Robert F. Wise, Jr.
Davis Polk & Wardwell
450 Lexington Avenue
New York, N.Y. 10017

Re: In the Matter of Banc of America Securities LLC, HO-9280
Waiver Request of Ineligible Issuer Status under Rule 405 of the Securities Act

Dear Mr. Wise:

This is in response to your letter dated February 9, 2007, written on behalf of Banc of America Securities LLC (Company), and constituting an application for relief from the Company being considered an "ineligible issuer" under Rule 405(1)(vi) of the Securities Act of 1933 (Securities Act). The Company requests relief from being considered an ineligible issuer under Rule 405, due to the entry on March 14, 2007, of a Commission Order (Order) pursuant to Sections 15(b)(4) and 21C of the Securities Exchange Act of 1934 (Exchange Act) naming the Company as a respondent.

Based on the facts and representations in your letter, and assuming the Company complies with the Order, the Commission, pursuant to delegated authority has determined that the Company has made a showing of good cause under Rule 405(2) and that the Company will not be considered an ineligible issuer by reason of the entry of the Order. Accordingly, the relief described above from the Company being an ineligible issuer under Rule 405 of the Securities Act is hereby granted. Any different facts from those represented or non-compliance with the Order might require us to reach a different conclusion.

Sincerely,

A handwritten signature in cursive script that reads "Mary Kosterlitz".

Mary Kosterlitz
Chief, Office of Enforcement Liaison
Division of Corporation Finance

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ROBERT F. WISE, JR.
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February 9, 2007

Re: **In the Matter of Banc of America Securities LLC, HO-9280**

Mary Kosterlitz, Esq.
Chief, Office of Enforcement Liaison
Division of Corporation Finance
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-7553

Dear Ms. Kosterlitz:

This letter is submitted on behalf of our clients, Bank of America Corporation ("BAC"), a reporting company registered under section 12 of the Securities Exchange Act of 1934, and Bank of America Securities LLC ("BAS"), a registered broker-dealer and a wholly owned subsidiary of BAC, to request that the Division of Corporation Finance, on behalf of the Commission, determine that BAC and BNY should not be considered "ineligible issuers" as defined in amended Rule 405 ("Rule 405") under the Securities Act of 1933 as a result of a proposed order (the "Order") to be entered in connection with settlement of an administrative action by the Commission against BAS in the above-captioned matter. We request the determination be made effective upon entry of the Order. We understand that the Division of Enforcement does not object to such determination.

BACKGROUND

BAS and the Enforcement Division Staff have been negotiating a settled resolution of the investigation and have reached agreement on the terms of the Order, which would institute an administrative action against BAS for violations

