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

Re: MIAX SAPPHIRE, LLC – 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 is the Form 1 Application seeking registration as a national securities exchange for MIAX Sapphire, LLC, a wholly owned subsidiary of Miami International Holdings, Inc. Please do not hesitate to contact me if you have any questions in connection with this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "GP Ziegler", with a long horizontal line extending to the right.

Gregory P. Ziegler
Vice President, Senior Counsel

Enclosure

cc: Lauren Yates, Special Senior Counsel
Division of Trading and Markets