

January 14, 2008

Mail Stop 4563

By U.S. Mail and facsimile to (617) 664-8209
Ronald E. Logue
Chief Executive Officer
State Street Corp.
One Lincoln Street
Boston, MA 02111

**Re: State Street Corp.
Definitive 14A
Filed March 19, 2007
File No. 01-7511**

Dear Mr. Logue:

We have reviewed your response letter dated October 19, 2007 and have the following comment. Please respond to our comment by January 228, 2008 or tell us by that time when you will provide us with a response. If the comments requests revised disclosure in future filings, please confirm in writing that you will comply with the comments in your future filings and also explain to us how you intend to comply. We welcome any questions you may have about our comments or any other aspect of our review.

Compensation Discussion and Analysis, page 21

1. In your response to prior comment 4, you indicate that the individual performance requirements for the CEO are determined by the Committee, in consultation with the CEO, and that the CEO and the other named executives determine those executive's performance requirements as an outgrowth of the CEO's requirements. Please confirm you will disclose in future filings the individual performance measurements for each named executive officer, how each named executive officer performed as compared to such measurements and how such performance affected each named executive officer's actual compensation.
2. In your response to prior comment 5, you point to your disclosure of the threshold and budgeted NIBTIC targets on page 23, and the operating basis earnings per share and ROE target performance on page 24. Although your disclosure indicates that these targets are important in understanding your incentive program, other disclosure indicates that the Committee and the incentive programs consider other targets. For example, you indicate that in addition to the threshold and budgeted NIBTIC targets, you also have "stretch" and maximum targets. Also, in your discussion of Mr. Logue's compensation, you make numerous references to

Ronald Logue, CEO
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budgeted “ranges” for other corporate performance metrics. Please confirm you will disclose in future filings all targeted amounts used to determine compensation under the plans, including ROE, NIBTIC targets and any other material performance targets. Also, to the extent that the budgeted amounts discussed in your discussion of the determination of Mr. Logue’s compensation were material to the Committee’s determination of the award amounts, please discuss how the Committee uses these budgeted numbers.

Please contact me at (202) 551-3419 with any questions.

Sincerely,

Christian N. Windsor
Special Counsel