

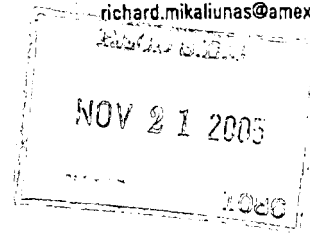


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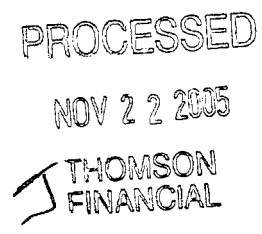
Richard A. Mikaliunas
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November 21, 2005

Mr. Brian Johnson
Branch Chief
Securities and Exchange Commission
Office of Filings and Information Services
Filer Support #2
Room #2531
100 F Street, N.E.
Washington, D.C. 20549



Dear Mr. Johnson:

This is to certify that the American Stock Exchange,(the "Exchange") received from Citigroup Funding Inc. (the "Registrant") a copy of the Company's application on Form 8-A for the registration of the following security:

**Equity Linked Securities (ELKSSM)
Based Upon the ADRs of Companhia Vale do Rio Doce**

We further certify that the above security has been approved by the Exchange for listing and registration, upon official notice of issuance, and understand that the 8A will be immediately effective upon your receipt of this letter.

Sincerely,

Richard Mikaliunas