

Paras Madho
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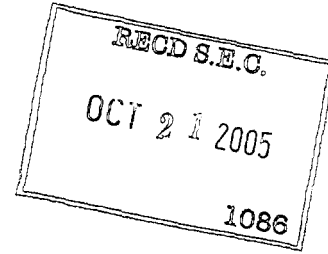
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CERTIFIED
NYSE



October 21, 2005

Mr. Brian Johnson
Branch Chief
Securities and Exchange Commission
Branch of Filer Support 2
Room 2531 – STOP 1004
100 F Street, NE
Washington, DC 20549



Dear Mr. Johnson:

The New York Stock Exchange certifies approval for listing and registration under the Securities Exchange Act of 1934, AXIS CAPITAL HOLDINGS LIMITED, 7.25% Series A Preferred Shares and requests immediate acceleration of registration. Adequate distribution assured. Form 8-A received on October 21, 2005. Tentative listing date – Not yet determined.

Sincerely,

Paras Madho

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