XILINX®

VIA E-MAIL

October 25, 2006

Arnold Golub, Esq.
Associate General Counsel
NASDAQ Stock Market
9600 Blackwell Road
Rockville, MD 20850

Re: File No. SR-NASDAQ-2006-040 and the Bundling of Services

Dear Mr. Golub:

Xilinx, Inc. is a NASDAQ-100 company and a S&P 500 company located in San Jose, CA. We are writing to object to the above-captioned proposed rule SR-NASDAQ-206-040. We should not be forced to pre-pay for a suite of bundled services as part of our increased NASDAQ listing fee. We strongly suggest that the Proposed Rule be withdrawn, or substantially revised to address our concerns below.

Per the NASDAQ email to all client companies dated October 2, 2006:

- The proposed new pricing structure translates into a nominal annual fee increase — all companies will maintain a price advantage when compared to NYSE and ARCA listing fees.
- The new value-added package of products and services are items that every listed company currently uses and needs and is valued well over the listing fee increase, representing a cost savings to your company.

First, Xilinx's fee increase is $20,000, which we do not view as a 'nominal amount'. Second, as we've told NASDAQ previously, many of the services it is now offering we never asked for and do not plan on using. In several cases, we use a competitor's product and are extremely pleased with our long standing relationships. As issuers, we should have the opportunity to choose the services for which we are paying, as well as the service providers from whom we receive those services.

Specifically, we use PR Newswire and have been a loyal customer of theirs for nearly 10 years. We have no interest in switching to a wire service unknown to the media and financial services community. We never considered Prime Zone in the past and would not choose them as a service provider today. However, the bundled services from NASDAQ force us to pay an additional fee to use an independent service provider, like PR Newswire, thereby paying twice for a similar service.

PR Newswire isn't the only service provider that Xilinx uses which differs from NASDAQ's list of captive providers. We were one of the very first clients of CCBN (now owned by Thompson). CCBN competes directly with Shareholder.com, a NASDAQ shareholder communications firm.

In conclusion, NASDAQ's proposed rule is anticompetitive and it creates an inherent conflict of interest. Xilinx would like to maintain the services providers we currently employ but not be charged twice for similar services. We never asked for these services so why should we pay additional fees. We have long standing relationships with several service providers that compete with NASDAQ's and don't have any intention of switching. As a result, we strongly oppose the bundling of services into the annual listing fee.

Sincerely,

Jon Olson
Chief Financial Officer
Xilinx, Inc.

Cc: Katherine England
Assistant Director
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Division of Market Supervision
Division of Market Regulation
US Securities and Exchange Commission
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