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**VIA HAND DELIVERY**

John C. Roeser, Associate Director  
Office of Market Supervision  
Division of Trading and Markets  
U.S. Securities and Exchange Commission  
100 F. Street, N.E.  
Washington, D.C. 20549

**Re: MIAX PEARL, LLC - Form 1 Application for Registration as a National Securities Exchange Pursuant to Section 6 of the Securities Exchange Act of 1934**

Dear Mr. Roeser:

Enclosed for official filing are an original and two copies of a Form 1 Application seeking registration as a national securities exchange for MIAX PEARL, 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 that reads "Barbara J. Comly". The signature is fluid and cursive, written in a professional style.

Barbara J. Comly  
EVP, General Counsel &  
Corporate Secretary

Enclosures

cc: Heidi Pilpel, Special Senior Counsel  
Division of Trading and Markets (with enclosures)