

March 3, 2006

Mail Stop 4561

By U.S. Mail and facsimile to (704) 386-4579

Mr. Alvaro G. de Molina
Chief Financial Officer
Bank of America Corporation
100 N. Tryon Street
Charlotte, NC 28255

Re: Bank of America Corporation
Form 10-K filed March 1, 2005
File No. 1-06523

Dear Mr. de Molina:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

John P.

Nolan

Accounting Branch Chief