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 for the Fiscal Year Ended December 31, 2005 Forms 10-Q for Fiscal Quarters Ended

March 31, 2006 and June 30, 2006

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