



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

July 18, 2011

Via Email

Robert Qutub
Chief Financial Officer
Merrill Lynch & Co. Inc.
Bank of America Tower
One Bryan Park
New York, NY 10036

**Re: Merrill Lynch & Co., Inc.
Form 10-K for Fiscal Year Ended December 31, 2010
Filed March 1, 2011
Form 10-Q for the Quarter Ended March 31, 2011
Filed May 6, 2011
File No. 001-7182**

Dear Mr. Qutub:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Christian Windsor

Christian Windsor
Special Counsel

cc: Via Email
Peter Taube
Chief Accounting Officer, Controller
Lizbeth Applebaum
Head of Accounting Policy
Merrill Lynch & Co., Inc.