July 21, 2006

Via U.S. Mail

Patrick J. O'Leary Executive Vice President, Treasurer and Chief Financial Officer SPX Corporation 13515 Ballantyne Corporate Place Charlotte, NC 28277

Re: SPX Corporation
Form 10-K dated December 31, 2005
Filed March 16, 2006
Form 8-K dated March 1, 2006
File No. 1-6948

Dear Mr. O'Leary:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Martin F. James Senior Assistant Chief Accountant