



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3233

July 11, 2016

Via E-Mail

Mr. Ronald Hassen  
Interim Chief Financial Officer and Senior Vice President  
Nasdaq, Inc.  
One Liberty Plaza  
New York, NY 10006

**Re: Nasdaq, Inc.**  
**Form 10-K for the year ended December 31, 2015**  
**Filed on February 26, 2016**  
**File No. 000-32651**

Dear Mr. Hassen:

We have reviewed your July 6, 2016 response to our comment letter and have the following comment. In our comment we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this comment within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comment applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to this comment we may have additional comments. Unless we note otherwise, our references to prior comments are to comments in our June 23, 2016 letter.

Form 10-K for the year ended December 31, 2015

Non-GAAP Financial Measures, page 47

1. We note your response to our prior comment one. Please include disclosure in future filings that describes the adjustments made to previously reported Non-GAAP measures, the reasons for such adjustments and why the revised measure disclosed represents a more useful presentation of the Company's operating performance.

Mr. Ronald Hassen  
Nasdaq, Inc.  
July 11, 2016  
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You may contact Shannon Sobotka, Staff Accountant, at (202) 551-3856 or the undersigned at (202) 551-3486 if you have questions.

Sincerely,

/s/ Daniel L. Gordon

Daniel L. Gordon  
Senior Assistant Chief Accountant  
Office of Real Estate and  
Commodities