Mail Stop 4561

December 8, 2006

By U.S. Mail and Facsimile to 011 44131 626 0550

Mr. Guy Robert Whittaker Group Finance Director The Royal Bank of Scotland Group plc RBS Gogarburn P.O. Box 1000 Edinburgh, Scotland EH12 1HQ

## Re: The Royal Bank of Scotland Group plc Form 20-F for Fiscal Year Ended December 31, 2005 Filed April 26, 2006 File No. 001-10306

Dear Mr. Whittaker:

We have completed our review of your Form 20-F and related filings and have no further comments at this time.

Sincerely,

Kevin W. Vaughn Accounting Branch Chief