



DIVISION OF  
CORPORATION FINANCE

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

June 4, 2013

Via E-mail

Jan de Ruiter  
Chairman of the Managing Board  
RBS Holdings N.V.  
Gustav Mahlerlaan 10  
1082 PP Amsterdam  
The Netherlands

**Re: RBS Holdings N.V.**  
**Form 20-F for the Fiscal Year Ended December 31, 2012**  
**Filed March 28, 2013**  
**File No. 1-14624**

Dear Mr. de Ruiter:

We refer you to our comment letter dated April 18, 2013, regarding business contacts with Cuba, Sudan, and Syria. We have completed our review of this subject matter. 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 filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Cecilia Blye

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Suzanne Hayes  
Assistant Director  
Division of Corporation Finance