



DIVISION OF  
CORPORATION FINANCE

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

January 28, 2014

Via E-mail

Patrick G. Flynn  
Chief Financial Officer  
ING Groep N.V.  
Bijlmerplein 888  
1102 MG Amsterdam  
P.O. Box 1800, 1000 BV Amsterdam  
The Netherlands

**Re: ING Groep N.V.  
Form 20-F for the Fiscal Year Ended December 31, 2012  
Filed March 22, 2013  
File No. 1-14642**

Dear Mr. Flynn:

We refer you to our comment letter dated December 24, 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: Jeffrey Riedler  
Assistant Director  
Division of Corporation Finance