



DIVISION OF
CORPORATION FINANCE

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

January 20, 2023

Wallace Cooney
Chief Financial Officer
Graham Holdings Co
1300 North 17th Street
Arlington, VA 22209

Re: Graham Holdings Co
Form 10-K for Fiscal Year Ended December 31, 2021
Filed February 25, 2022
File No. 001-06714

Dear Wallace Cooney:

We have completed our review of your filings. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance
Office of Trade & Services