

Mail Stop 4561

January 28, 2008

By mail and facsimile to 44-20-7992-4872

Mr. Douglas J. Flint  
Group Finance Director  
HSBC Holdings plc  
8 Canada Square  
London E14 5HQ  
United Kingdom

**Re: HSBC Holdings plc  
Form 20-F for the Fiscal Year Ended December 31, 2006  
Filed March 9, 2007  
File No. 001-14930**

Dear Mr. Flint:

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

Sincerely,

Donald Walker  
Senior Assistant Chief Accountant