

Mail Stop 4561

February 10, 2009

*By U.S. Mail and Facsimile to (787) 767-7913*

Ms. Maria Calero  
Senior Executive Vice President and Chief Compliance Officer  
Santander Bancorp  
207 Ponce de Leon Avenue  
Hato Rey, Puerto Rico 00917

**RE: Santander Bancorp  
Form 10-K for the Fiscal Year Ended December 31, 2007 and  
Form 10-Q for the Period Ended September 30, 2008  
File No. 001-15849**

Dear Ms. Calero:

We have completed our review of your Form 10-K and Form 10-Q and have no further comments at this time.

Sincerely,

Kevin W. Vaughn  
Accounting Branch Chief