



DIVISION OF  
CORPORATION FINANCE

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

May 12, 2011

James T. Crines  
Executive Vice President, Finance and  
Chief Financial Officer  
Zimmer Holdings, Inc.  
345 East Main Street  
Warsaw, Indiana 46580

**Re: Zimmer Holdings, Inc.**  
**Form 10-K for the year ended December 31, 2010**  
**Filed February 25, 2011**  
**File No. 1-16407**

Dear Mr. Crines

We have completed our review of your filing. 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,

Kevin L. Vaughn  
Accounting Branch Chief