

Mail Stop 4561

December 2, 2009

Hwi Joon Shin  
Chief Financial Officer  
Webzen Inc.  
Daelim Acrotel Building, 8<sup>th</sup> Floor  
467-6 Dogok-dong, Kangnam-ku  
Seoul, Korea 135-971

**Re: Webzen Inc.**  
**Form 20-F For the Fiscal Year Ended December 31, 2008**  
**Filed June 29, 2009**  
**Form 20-F/A For the Fiscal Year Ended December 31, 2008**  
**Filed November 20, 2009**  
**File No. 000-50476**

Dear Mr. Shin:

We have completed our review of the above referenced filings and have no further comments at this time on the specific issues raised.

Sincerely,

Stephen G. Krikorian  
Accounting Branch Chief

cc: Via facsimile at +852-2533-3388  
Richard (Sukjoon) Lee  
Davis Polk & Wardwell LLP