



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

DIVISION OF  
CORPORATION FINANCE

July 29, 2019

Cindy Xiaofan Wang  
Chief Financial Officer  
Ctrip.com International, Ltd.  
968 Jin Zhong Road  
Shanghai 200335  
People's Republic of China

**Re: Ctrip.com International, Ltd.**  
**Form 20-F for the Fiscal Year Ended December 31, 2018**  
**Filed March 15, 2019**  
**File No. 001-33853**

Dear Ms. Wang:

We have completed our review of your filing. 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 Information Technologies  
and Services

cc: Julie Gao