



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

December 16, 2008

Mr. Scott Cooley  
Chief Financial Officer, Morningstar, Inc.  
225 West Wacker Drive  
Chicago, IL 60606-6303

**Re: Morningstar, Inc**  
**Form 10-K for the year ended December 31, 2007**  
**Definitive Proxy Statement, April 9, 2008**  
**Form 10-Q for the quarter ended September 30, 2008**  
**File No. 0-51280**

Dear Mr. Cooley:

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

If you have any further questions regarding our review of your filings, please direct them to Mindy Hooker, Staff Accountant, at (202) 551-3732, Era Anagnosti, Attorney, at (202) 551-3369, Andrew Schoeffler, Attorney, at (202) 551-3748 or to the undersigned at (202) 551-3768.

Sincerely,

John Cash  
Branch Chief