



DIVISION OF
CORPORATION FINANCE

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

Mail Stop 3720

January 14, 2010

Via U.S. Mail and Facsimile: (832) 218-8788

Mr. Ian Morris
Chief Executive Officer
Market Leader, Inc.
11332 NE 122nd Way
Kirkland, Washington 98034

**RE: Market Leader, Inc.
Form 10-K for the year ended December 31, 2008
Filed March 13, 2009
File No. 000-51032**

Dear Mr. Morris:

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

Sincerely,

/s/ Larry Spigel
Assistant Director