

December 16, 2008

Via U.S. Mail and Facsimile (973-939-1596)

William J. Severance
Senior Vice President and Chief Accounting Officer
Travelport Limited
400 Interpace Parkway, Building A
Parsippany, NJ 07054

Re: Travelport Limited
Form 10-K for the Fiscal Year Ended December 31, 2007
Filed March 11, 2008
File No. 333-141714
Response Letters Dated October 17, 2008 and December 8, 2008

Dear Mr. Severance:

We refer you to our comment letters dated September 26, 2008 and November 21, 2008 regarding business contacts with Syria. We have completed our review of this subject matter and have no further comments at this time.

Sincerely,

Cecilia Blye, Chief
Office of Global Security Risk

cc: Max Webb
Assistant Director
Division of Corporation Finance