

October 16, 2008

Via U.S. Mail and Facsimile (312-894-4856)

Steven Barnhart  
President, Chief Executive Officer, and Director  
Orbitz Worldwide, Inc.  
500 W. Madison Street, Suite 1000  
Chicago, Illinois 60661

**Re: Orbitz Worldwide, Inc.  
Form 10-K for the Fiscal Year Ended December 31, 2007  
Filed March 11, 2008, Amended August 28, 2008  
File No. 1-33599  
Response Letter Dated October 10, 2008**

Dear Mr. Barnhart:

We refer you to our comment letter dated September 26, 2008 regarding business contacts with Cuba, Iran, and 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