



DIVISION OF
CORPORATION FINANCE

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

Mail Stop 3561

December 10, 2009

Via U.S. Mail

Barney Harford
Chief Executive Officer
Orbitz Worldwide, Inc.
500 W. Madison Street
Suite 1000
Chicago, IL 60661

**Re: Orbitz Worldwide, Inc.
Amendment No. 1 to Preliminary Proxy Statement on Schedule 14A
Filed December 8, 2009
File No. 001-33599**

Dear Mr. Harford:

We have completed our review of your preliminary proxy statement filed on Schedule 14A and have no further comments at this time.

Sincerely,

Lauren Nguyen
Attorney-Advisor

cc: Richard Truesdell, Esq.
Davis Polk & Wardwell LLP
via facsimile (212) 701-5674