



DIVISION OF  
CORPORATION FINANCE

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

October 24, 2019

Jennifer Rock  
Chief Accounting Officer  
Zillow Group, Inc.  
1301 Second Avenue  
Floor 31  
Seattle, WA 98101

**Re: Zillow Group, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2018**  
**Filed February 21, 2019**  
**File No. 001-36853**

Dear Ms. Rock:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Technology