

Mail Stop 3561

September 3, 2009

James T. Ryan  
President and Chief Executive Officer  
W.W. Grainger, Inc.  
100 Grainger Parkway  
Lake Forest, Illinois 60045-5201

**Re: W.W. Grainger, Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2008**  
**Filed February 27, 2009**  
**File No. 001-05684**

Dear Mr. Ryan:

We have completed our review of the above referenced filings and we have no further comments at this time.

Sincerely,

H. Christopher Owings  
Assistant Director