



DIVISION OF  
CORPORATION FINANCE

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

October 12, 2010

Mr. Gabriel Jaramillo  
Chief Executive Officer  
Santander Holdings USA, Inc.  
75 State Street, 5<sup>th</sup> Floor  
Boston, Massachusetts 02109

**Re:   Santander Holdings USA, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2009**  
**Form 10-K/A for the Fiscal Year Ended December 31, 2009**  
**Form 10-Q for the quarter ended June 30, 2010**  
**File No. 001-16581**

Dear Mr. Jaramillo:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Erin Magnor  
Attorney