Jeffrey W. Jones Chief Financial Officer Vail Resorts, Inc. 390 Interlocken Crescent, Suite 1000 Broomfield, CO 80021

> Re: Vail Resorts, Inc. File No. 001-09614 Form 10-K: For the Fiscal Year Ended July 31, 2008 Definitive Proxy Statement on Schedule 14A

Dear Mr. Jones:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Lyn Shenk Branch Chief