

January 8, 2007

Mail Stop 4561

Mr. William S. Sheridan
Executive Vice President and Chief Financial Officer
Sotheby's Holdings, Inc.
1334 York Ave.
New York, NY 10021

RE: **Sotheby's Holdings, Inc.**
Form 10-K for the fiscal year ended December 31, 2005
Filed March 16, 2006
File No. 1-09750

Dear Mr. Sheridan:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Daniel L. Gordon
Branch Chief