



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

DIVISION OF  
CORPORATION FINANCE

January 25, 2011

Irene M. Dorner  
President and Chief Executive Officer  
HSBC USA Inc.  
452 Fifth Street  
New York, New York 10018

**Re: HSBC USA**  
**Form 10-K for Fiscal Year Ended December 31, 2009**  
**File No. 1-07436**

Dear Ms. Dorner:

We have completed our review of your Form 10-K for the fiscal year ended December 31, 2009, and we have no further comments.

Sincerely,

Michael Clampitt  
Senior Counsel