

December 9, 2008

Mail Stop 4561

*By U.S. Mail and facsimile to 1-34-91-374-50-20*

Manuel Gonzalez Cid  
Chief Financial Officer  
Banco Bilbao Vizcaya Argentaria, S.A.  
Plaza de San Nicola 4  
48005 Bilbao, Spain

**Re: Banco Bilbao Vizcaya Argentaria, S.A.  
Form 20-F filed March 31, 2008  
File No. 001-10110**

Dear Mr. Gonzalez:

We have completed our review of your Form 20-F and related filings and have no further comments at this time.

Sincerely,

John P. Nolan  
Senior Assistant Chief Accountant

CC: Michael J. Willisch  
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