

Mail Stop 4561

December 8, 2006

By U.S. Mail and Facsimile to 011 44131 626 0550

Mr. Guy Robert Whittaker
Group Finance Director
The Royal Bank of Scotland Group plc
RBS Gogarburn
P.O. Box 1000
Edinburgh, Scotland EH12 1HQ

**Re: The Royal Bank of Scotland Group plc
Form 20-F for Fiscal Year Ended December 31, 2005
Filed April 26, 2006
File No. 001-10306**

Dear Mr. Whittaker:

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

Sincerely,

Kevin W. Vaughn
Accounting Branch Chief