

Mail Stop 3561

August 8, 2008

Via Facsimile and U.S. Mail

Mr. John D. Clagg
Chief Financial Officer
YTB INTERNATIONAL, INC.
1901 East Edwardsville Road
Wood River, Illinois 62095

Re: YTB International, Inc.
Form 10-KSB for the year ended December 31, 2007
File No. 0-18412

Dear Mr. Clagg:

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

Sincerely,

David R. Humphrey
Branch Chief