



DIVISION OF  
CORPORATION FINANCE

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

November 28, 2012

Via E-mail

Mr. Steve Boyd  
Principal Accounting Officer  
YTB International, Inc.  
1901 East Edwardsville Road  
Wood River, IL 62095

**Re: YTB International, Inc.  
Form 10-K for Fiscal Year Ended December 31, 2010  
Filed March 29, 2011  
Form 10-Q for Fiscal Quarter Ended June 30, 2011  
Filed August 15, 2011  
Form 10-Q for Fiscal Quarter Ended September 30, 2011  
Filed November 14, 2011  
File No. 000-18412**

Dear Mr. Boyd:

We issued comments on the above captioned filings on May 23, 2012. On September 7, 2012, we issued a follow-up letter informing you that those comments remained outstanding and unresolved, and absent a substantive response, we would act consistent with our obligations under the federal securities laws.

As you have not provided a substantive response, we are terminating our review and will take further steps as we deem appropriate. These steps will include our releasing of all correspondence relating to our review on the EDGAR system.

You may contact Jeffrey Sears at 202-551-3302 or Lyn Shenk at 202-551-3380 if you have any questions.

Sincerely,

/s/ Lyn Shenk

Lyn Shenk  
Branch Chief