

October 20, 2009

Via International Mail and Facsimile (011-44-1895-51-2471)

Richard Solomons  
Finance Director  
InterContinental Hotels Group PLC  
Broadwater Park, Denham  
Buckinghamshire UB9 5HR, U.K.

**Re: InterContinental Hotels Group PLC  
Form 20-F for the Fiscal Year Ended December 31, 2008  
Filed April 7, 2009  
File No. 1-10409  
Response Letters Dated September 29, 2009 and September 30, 2009**

Dear Mr. Solomons:

We refer you to our comment letter dated August 20, 2009 regarding business contacts with Cuba, Iran, Sudan, and Syria. We have completed our review of this subject matter and have no further comments at this time.

Sincerely,

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Karen Garnett  
Assistant Director  
Division of Corporation Finance