



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 4720

July 1, 2009

James C. Kranz  
Executive Vice President and Chief Financial Officer  
Hudson City Bancorp, Inc.  
West 80 Century Road  
Paramus, New Jersey 07652  
By U.S. Mail and facsimile to (201) 967-0559

**Re: Hudson City Bancorp, Inc.**  
**Form 10-K for the fiscal year ended December 31, 2008**  
**Form 10-Q for the quarterly period ended March 31, 2009**  
**File No. 000-26001**

Dear Mr. Kranz:

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

Sincerely,

John P. Nolan  
Senior Assistant Chief Accountant