

April 4, 2024

Kjelti Kellough
General Counsel
Getty Images Holdings, Inc.
605 5th Ave S., Suite 400
Seattle, Washington 98104

Holdings, Inc.

Statement on Form S-3

Re: Getty Images

Registration

Filed April 2, 2024

File No. 333-278454

Dear Kjelti Kellough:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Jenna Hough at 202-551-3063 with any questions.

Sincerely,

Division of Corporation Finance

Office of Trade & Services