

January 3, 2024

Jennifer Leyden
Chief Financial Officer
Getty Images Holdings, Inc.
605 5th Ave. S. Suite 400
Seattle, WA 98104

Holdings, Inc.

Fiscal Year Ended December 31, 2022

Re: Getty Images

Form 10-K for

File No. 001-41453

Dear Jennifer Leyden:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance

Office of Trade & Services