

**Getty Images Holdings, Inc.**  
605 5th Ave S., Suite 400  
Seattle, Washington 98104

April 24, 2024

**VIA EDGAR**

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
Office of Technology  
100 F Street, N.E.  
Washington, D.C. 20549

**Re: Getty Images Holdings, Inc.**  
**Registration Statement on Form S-3**  
**Filed April 2, 2024**  
**File No. 333-278454**

Ladies and Gentlemen:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, Getty Images Holdings, Inc. (the “**Company**”) hereby requests that the U.S. Securities and Exchange Commission (the “**Commission**”) take appropriate action to declare the above-referenced Registration Statement on Form S-3 to become effective on April 26, 2024, at 4:00 p.m., Eastern Time, or as soon as practicable thereafter.

The Company hereby authorizes Heather Emmel of Weil, Gotshal & Manges LLP, counsel to the Company, to orally modify or withdraw this request for acceleration.

The Company requests that it be notified of such effectiveness by a telephone call to Heather Emmel of Weil, Gotshal & Manges LLP at (212) 310 8849.

Very truly yours,

GETTY IMAGES HOLDINGS, INC.

By: /s/ Kjelti Kellough  
Name: Kjelti Kellough  
Title: Senior Vice President, General Counsel and Secretary

cc: Heather Emmel, Weil, Gotshal & Manges LLP  
Sakshi Sharma, Weil, Gotshal & Manges LLP  
Tina Tang, Weil, Gotshal & Manges LLP