

Getty Images Holdings, Inc.

605 5th Ave S., Suite 400
Seattle, Washington 98104

September 15, 2022

VIA EDGAR

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Technology
100 F Street, N.E.
Washington, D.C. 20549
Attn: Scott Anderegg; Erin Jaskot

**Re: Getty Images Holdings, Inc.
Registration Statement on Form S-1
File No. 333-266686**

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-1 to become effective on September 15, 2022, at 5:00 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
Shelby Stanton, Weil, Gotshal & Manges LLP
Tina Tang, Weil, Gotshal & Manges LLP
Federica Marini, Weil, Gotshal & Manges LLP
