

Arnold Golub  
Vice President  
Listing Qualifications

By Electronic Mail

October 12, 2018

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

Division of Corporation Finance:

This is to certify that on October 12, 2018 The Nasdaq Stock Market (the "Exchange") received from Weight Watchers International, Inc. (the "Registrant") a copy of the Registrant's application on Form 8-A 12(b) for the registration of the following security:

Common Stock, no par value

We further certify that the security described above has been approved by the Exchange for listing and registration.

We understand that the Registrant is seeking immediate acceleration of the effective date of registration, and we hereby join in such request.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Arnold Golub', is written below the word 'Sincerely,'.