



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-7010

DIVISION OF
CORPORATION FINANCE

Mail Stop 3010

May 5, 2010

Richard A. Smith
President and Chief Executive Officer
Realogy Corporation
One Campus Drive
Parsippany, NJ 07054

**Re: Realogy Corporation
Form 10-K for the year ended December 31, 2008
Filed February 25, 2009
File No. 333-148153**

Dear Mr. Smith:

We have completed our review of your filing and have no further comments at this time.

Sincerely,

Karen J. Garnett
Assistant Director