

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

Mail Stop 7010

December 30, 2008

Mr. T. Kevin DeNicola Chief Financial Officer KBR, Inc. 601 Jefferson Street Suite 3400 Houston, TX 77002

RE: Form 10-K for the fiscal year ended December 31, 2007

Forms 10-Q for the periods ended March 31, 2008, June 30, 2008 and

September 30, 2008

Schedule 14A Definitive Proxy Statement filed on March 25, 2008

File No. 1-33146

Dear Mr. DeNicola:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

If you have any further questions regarding our review of legal or disclosure matters in your filings, please direct them to Era Anagnosti, Staff Attorney, at (202) 551-3369 or, in her absence, Brigitte Lippmann, Senior Staff Attorney, at (202) 551-3713. Please contact Jeffrey Gordon, Staff Accountant, at (202) 551-3866 or, in his absence, the undersigned at (202) 551-3689 if you have questions regarding our review of the financial statements and related matters.

Sincerely,

John Hartz Senior Assistant Chief Accountant