



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

DIVISION OF  
CORPORATION FINANCE

May 7, 2014

Via E-mail

Mr. Anthony E. Hull  
Executive Vice President, Chief Financial Officer and Treasurer  
Realogy Holdings Corp.  
Realogy Group LLC  
175 Park Avenue  
Madison, New Jersey 07940

**Re: Realogy Holdings Corp.  
Form 10-K for fiscal year ended December 31, 2013  
Filed on February 27, 2014  
File No. 001-35674**

**Realogy Group LLC  
Form 10-K for fiscal year ended December 31, 2013  
Filed on February 27, 2014  
File No. 333-148153**

Dear Mr. Hull:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Kevin Woody

Kevin Woody  
Branch Chief