UNITED STATES SECURITIES AND EXCHANGE COMMISSION January 27, 2009

ORDER GRANTING CONFIDENTIAL TREATMENT UNDER THE SECURITIES EXCHANGE ACT OF 1934

Popular, Inc. File No. 001-34084 - CF# 22778

Popular, Inc. submitted an application under Rule 24b-2 requesting confidential treatment for information it excluded from the Exhibits to a Form 10-Q filed on November 10, 2008.

Based on representations by Popular, Inc. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibit(s) will not be released to the public for the time period(s) specified:

Exhibit 10.2

through November 11, 2013

For the Commission, by the Division of Corporation Finance, pursuant to the delegated authority:

Christian Windsor Special Counsel