



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-4628

August 30, 2011

Via E-Mail

Michael K. Neborak  
Chief Financial Officer  
Willis Group Holdings plc  
c/o Willis Group Limited  
51 Lime Street  
London EC3M 7DQ  
England

**Re: Willis Group Holdings plc  
Form 10-K for the Fiscal Year Ended December 31, 2010  
Filed February 28, 2011  
File No. 001-16503**

Dear Mr. Neborak:

We refer you to our comment letter dated July 11, 2011 regarding business contacts with Iran, Syria and Sudan. We have completed our review of this subject matter. 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/ Cecilia Blye

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Jeffrey Riedler  
Assistant Director  
Division of Corporation Finance