



November 19, 2009

**VIA EDGAR**

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549  
Attention: Mr. Kyle Moffatt

Re: Clear Channel Outdoor Holdings, Inc. (the "Company")  
Form 10-K for the fiscal year ended December 31, 2008, filed March 2, 2009  
File No. 001-32663

Dear Mr. Moffatt:

The Company has requested a conference call with the Staff tentatively scheduled for December 1, 2009 to discuss its response to the Staff's letter dated October 19, 2009. The Company plans to file a written response via EDGAR shortly after the call.

Very truly yours,

/s/ Herbert W. Hill, Jr.

Herbert W. Hill, Jr.  
Senior Vice President and Chief Accounting Officer

cc: Randall T. Mays  
President and Chief Financial Officer