

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

December 15, 2006

## Via US Mail and Facsimile

Gracia C. Martore Chief Financial Officer Gannett Co., Inc. 7950 Jones Branch Drive McLean, VA 22107-0910

Re: Gannett Co., Inc.

Form 10-K for the year ended December 25, 2005

File No. 001-06961

Dear Ms. Martore:

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

Sincerely,

David R. Humphrey Branch Chief