

GABELLI GLOBAL MULTIMEDIA TRUST INC  
Form UNDER  
June 30, 2011

**One Corporate Center**  
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June 30, 2011

Laura E. Hatch

U.S. Securities and Exchange Commission

Division of Investment Management

100 F Street, N.E.

Washington, DC 20549

Re: The Gabelli Global Multimedia Trust Inc. (the Fund )

Pre-Effective Amendment No. 2 to the Registration Statement on Form N-2 (the Registration Statement ) File  
No. 333-173800

Dear Ms. Hatch:

This letter is in regard to the Registration Statement of the Fund, which was filed on April 29, 2011, and amended on June 23, 2011, and June 29, 2011.

The Registrant hereby undertakes that it will file a post-effective amendment to its Registration Statement if it determines to conduct a rights offering while said Registration Statement is effective.

This undertaking supplements Undertaking No. 3 to Item 34 of Part C of the above referenced Registration Statement. If you have any questions concerning this filing, please contact Rachael Schwartz, Esq. at 212-318-6275.

Sincerely,

The Gabelli Global Multimedia Trust Inc.

By: /s/ Agnes Mullady

Name: Agnes Mullady

Title: Secretary and Treasurer

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[Letterhead of Paul, Hastings, Janofsky & Walker LLP]

(212) 318-6275

rachaelschwartz@paulhastings.com

June 30, 2011

77355-00005

**VIA EDGAR**

Securities and Exchange Commission

100 F Street, N.E.

Washington, DC 20549

Re: The Gabelli Global Multimedia Trust Inc. (the Fund )

Registration Statement on Form N-2

Ladies and Gentlemen

On behalf of the Fund, transmitted herewith for filing is Form Under, pursuant to which the Fund has made a supplemental undertaking related to its Registration Statement on N-2.

Should you have any questions or comments regarding the filing, please do not hesitate to contact the undersigned at the number above.

Very truly yours,

/s/ Rachael Schwartz

Rachael Schwartz

for PAUL, HASTINGS, JANOFSKY & WALKER LLP

Enclosures