



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-0405

Mail Stop 3561

August 21, 2008

Mr. Joseph Sorci
Chief Executive Officer
Accelerated Building Concepts Corporation
2910 Bush Drive
Melbourne, FL 32935

Re: Accelerated Building Concepts Corporation
Item 4.02 Form 8-K
Filed August 19, 2008
File No. 1-11873

Dear Mr. Sorci:

We have reviewed your filing and have the following comment. We think you should revise your document in response to this comment. If you disagree, we will consider your explanation as to why our comment is inapplicable or a revision is unnecessary. Please be as detailed as necessary in your explanation. In our comment, we may ask you to provide us with more information so we may better understand your disclosure. After reviewing this information, we may raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comment or any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

Form 8-K filed August 19, 2008

1. Item 4.02(a) of Form 8-K requires you to disclose the following information if your board of directors, a committee of the board of directors or an officer or officers authorized to take such action if board action is not required, concludes that previously issued financial statements should no longer be relied upon:

(1) the date on which the board of directors, a committee of the board of directors or an officer or officers authorized to take such action if board action is not required concluded that the previously issued financial statements should no longer be relied upon;

(2) a brief description of the facts underlying the conclusion to the extent known to you at the time of filing; and

(3) whether the audit committee, or the board of directors in the absence of an audit committee, or authorized officer(s), discussed with your independent accountant the matters disclosed in the filing.

Please amend your filing to provide the above disclosures, or otherwise advise us as to why you believe such disclosures are not required.

As appropriate, please amend your filing and respond to this comment within five business days or tell us when you will provide us with a response. You may wish to provide us with marked copies of the amendment to expedite our review. Please furnish a cover letter that provides any requested information. Detailed cover letters greatly facilitate our review. Please understand that we may have additional comments after reviewing your amendment and response to our comment. Please submit your response letter on EDGAR.

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 all information required under the Securities Exchange Act of 1934 and that they have provided all information investors require for an informed investment decision. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In connection with responding to our comment, please provide, in writing, a statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to 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.

In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filing or in response to our comments on your filing.

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If you have any questions regarding this comment, please direct them to me at (202) 551-3336. In my absence, you may direct your questions to Robyn Manuel at (202) 551-3823.

Sincerely,

Adam Phippen
Staff Accountant