



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

DIVISION OF
CORPORATION FINANCE

September 2, 2010

Zeev Vurembrand
Chief Executive Officer
Alon Holdings Blue Square – Israel, LTD.
2 Amal Street
Rosh Ha'ayin 48092, Israel

**Re: Alon Holdings Blue Square – Israel, LTD.
Form 20-F for the Fiscal Year Ended December 31, 2009
Filed June 24, 2010
File No. 001-14426**

Dear Mr. Vurembrand:

We have completed our review of your filing and do not have any further comments at this time.

Sincerely,

William Thompson
Accounting Branch Chief