

November 17, 2008

Mail Stop 4561

Ms. Andrea Barney  
Principal Accounting Officer and Controller  
Capital Alliance Income Trust LTD., A Real Estate Investment Trust  
100 Pine Street, Suite 2450  
San Francisco, CA 94111

**RE: Capital Alliance Income Trust LTD., A Real Estate Investment Trust  
Form 10-KSB for the fiscal year ended December 31, 2007  
File No. 1-12941**

Dear Ms. Barney:

We have completed our review of your Form 10KSB and related filings and do not, at this time, have any further comments.

Sincerely,

Daniel L. Gordon  
Branch Chief