



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4561

February 28, 2017

Richard Chance  
Chief Financial Officer  
Modsys International Ltd.  
6600 LBJ Freeway, Suite 210  
Dallas, Texas 75240

**Re: Modsys International Ltd.  
Preliminary Proxy Statement on Schedule 14A  
Filed February 15, 2017  
File No. 333-06208**

Dear Mr. Chance:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ Maryse Mills-Apenteng

Maryse Mills-Apenteng  
Special Counsel  
Office of Information Technologies  
and Services

cc: Alan Hambelton  
Cooley LLP