

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

Mail Stop 6010

September 13, 2007

Mr. Paul E. Ross Senior Vice President of Finance and Chief Financial Officer Meade Instruments Corp. 6001 Oak Canyon Irvine, California 92618

> RE: Meade Instruments Corp Form 10-K for the fiscal year ended February 28, 2007 Filed June 1, 2007 File No. 0-22183

Dear Mr. Ross:

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

Sincerely,

Angela J. Crane Accounting Branch Chief