



DIVISION OF
CORPORATION FINANCE

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

November 29, 2010

Mr. Guy Bernstein
Chief Executive Officer
Formula Systems (1985) Ltd.
5 Haplada Street
Or Yehuda 60218, Israel

**Re: Formula Systems (1985) Ltd.
Form 20-F and Form 20-F/A for the Fiscal Year Ended December 31, 2009
Filed April 29, 2010 and May 10, 2010, respectively
File No. 000-29442**

Dear Mr. Bernstein:

We have completed our review of your Form 20-F and related filings and have no further comments at this time on the specific issues raised.

Sincerely,

Kathleen Collins
Accounting Branch Chief