



DIVISION OF
CORPORATION FINANCE
MAIL STOP 7010

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-7010

December 23, 2008

Mr. Donald R. Willoughby
Chief Financial Officer
Getty Copper Inc.
1000 Austin Avenue
Coquitlam, British Columbia
Canada V3K3P1

Re: Getty Copper Inc.
Form 20-F for Fiscal Year Ended December 31, 2007
Filed July 15, 2008
Form 6-K furnished May 8, 2008
Form 20-F/A-1 Fiscal Year Ended December 31, 2007
Filed December 23, 2008
File no: 000-29578

Dear Mr. Willoughby:

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

Sincerely,

Karl Hiller
Branch Chief