



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-4628

February 16, 2011

Mr. Donald Willoughby
Chief Financial Officer
Getty Copper Inc.
1000 Austin Avenue
Coquitlam, British Columbia V3K 3P1 Canada

Re: Getty Copper Inc.
Form 20-F for the Fiscal Year Ended December 31, 2009
Filed June 24, 2010
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