



DIVISION OF  
CORPORATION FINANCE

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

April 26, 2011

Via Mail and Facsimile (305-507-2001)

Felipe Menendez Ross  
Chief Executive Officer, President and Director  
Ultrapetrol (Bahamas) Limited  
Ocean Centre, Montagu Foreshore  
East Bay Street  
P.O. Box SS-19084  
Nassau, Bahamas

**Re: Ultrapetrol (Bahamas) Limited  
Form 20-F for the Fiscal Year Ended December 31, 2010  
Filed March 14, 2011  
File No. 001-33068**

Dear Mr. Ross:

We refer you to our comment letter dated March 31, 2011 regarding potential business contacts with Iran, Syria, Sudan and Cuba. We have completed our review of this subject matter and have no further comments at this time.

Sincerely,

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Max Webb  
Assistant Director  
Division of Corporation Finance