

Mail Stop 4561

October 10, 2007

Mr. Qu Shizhi
Chief Financial Officer
Yantai Dahua Holdings Company Limited
East of Muping
Yantai, Shandong, PRC

**RE: Yantai Dahua Holdings Company Limited
Form 20-F for the period ended December 31, 2006
Filed March 14, 2007
File No. 0-50184**

Dear Mr. Qu:

We have completed our review of your Form 20-F and do not, at this time, have any further comments.

Sincerely,

Daniel L. Gordon
Branch Chief