



DIVISION OF
CORPORATION FINANCE

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

November 2, 2011

Via E-mail
Tyrus C. Young
Chief Financial Officer
Orpheum Property, Inc.
201 St. Charles Ave., Ste. 2500
New Orleans, Louisiana 70170

Re: Orpheum Property, Inc.
Form 10-K for Fiscal Year Ended March 31, 2010
Filed July 28, 2010
Form 10-Q for the Quarterly Period Ended December 31, 2010
Filed February 14, 2011
Form 8-K Filed July 28, 2010
File No. 0-30595

Dear Mr. Young:

We issued comments to Orpheum Property, Inc. on the above captioned filings on June 7, 2011. As of the date of this letter, these comments remain outstanding and unresolved. We expect you to contact us by November 17, 2011 to provide a substantive response to these comments or to advise us why you are unable to respond and when you will be able to do so.

If you do not respond to the outstanding comments or contact us by November 17, 2011, we will, consistent with our obligations under the federal securities laws, decide how we will seek to resolve material outstanding comments and complete our review of your filings and your disclosure. Among other things, we may decide to release publicly, through the agency's EDGAR system, all correspondence, including this letter, relating to the review of your filings, consistent with the staff's decision to release publicly comment letters and response letters relating to disclosure filings it has reviewed. You can find more information about the staff's decision to release filing correspondence at <http://www.sec.gov/news/press/2004-89.htm> and <http://www.sec.gov/news/press/2005-72.htm>.

You may contact Tony Watson, Accountant, at (202) 551-3318 if you have questions regarding our comments. Please contact me at (202) 551-3344 with any other questions.

Sincerely,

/s/ William H. Thompson

William H. Thompson
Accounting Branch Chief