



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

Mail Stop 4561

November 13, 2009

Elias MurrayMetzger
Chief Financial Officer
Avistar Communications Corp.
1875 S. Grant St., 10th Fl.
San Mateo, CA 94402

Re: Avistar Communications Corp.
Preliminary Information Statement on Schedule 14C
Filed November 5, 2009
File No. 000-31121

Dear Mr. MurrayMetzger:

We have completed our review of your filing and have no further comments at this time on the specific issues raised.

Sincerely,

Maryse Mills-Apenteng
Special Counsel