



DIVISION OF
CORPORATION FINANCE

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

October 23, 2009

Via Mail and Facsimile (212-225-3999)

José Sérgio Gabrielli de Azevedo
Chief Executive Officer
Petroleo Brasileiro S.A.-Petrobras
Avenida Republica do Chile, 65
20031-912-Rio de Janeiro-RJ
Brazil

Re: Petroleo Brasileiro S.A.-Petrobras
Form 20-F for the Fiscal Year Ended December 31, 2008
Filed May 22, 2009
File No. 1-15106
Response Letter Filed October 6, 2009

Dear Mr. Gabrielli de Azevedo:

We refer you to our comment letters dated August 19, 2009 and September 23, 2009 regarding business contacts with 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: Roger Schwall
Assistant Director
Division of Corporation Finance

Francesca O'Dell, Esq. (Via Facsimile)
Cleary Gottlieb Steen & Hamilton LLP