

Mail Stop 3010

December 10, 2009

Mr. Kevin W. McAleer  
Executive Vice President and Chief Financial Officer  
Penson Worldwide, Inc.  
1700 Pacific Avenue, Suite 1400  
Dallas, TX 75201

**Re: Penson Worldwide, Inc.  
Form 10-K for the Year Ended December 31, 2008  
Forms 10-Q for the Periods Ended March 31 and June 30, 2009  
Schedule 14A filed April 8, 2009  
File No. 1-32878**

Dear Mr. McAleer:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Daniel L. Gordon  
Branch Chief