



DIVISION OF
CORPORATION FINANCE

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

October 22, 2010

Mr. Stephen T. Lundy
Chief Executive Officer
AspenBio Pharma, Inc.
1585 South Perry Street
Castle Rock, Colorado 80104

Re: AspenBio Pharma, Inc.
Form 10-K for the Fiscal Year Ended December 31, 2009
Filed March 9, 2010
Form 10-K/A for the Fiscal Year Ended December 31, 2009
Filed April 28, 2010
File No. 001-33675

Dear Mr. Lundy:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Melissa Rocha
Accounting Branch Chief