

Mail Stop 6010

October 22, 2008

O. Joe Caldarelli
Chief Executive Officer
CPI International, Inc.
811 Hansen Way
Palo Alto, CA 95303

**Re: CPI International, Inc.
Form 10-K for Fiscal Year Ended September 28, 2007
Filed December 12, 2007
File 0-51928**

Dear Mr. Caldarelli:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Tim Buchmiller
Senior Attorney

cc (via fax): Richard C. Wirthlin, Esq.