



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-3561

DIVISION OF  
CORPORATION FINANCE

December 2, 2010

Mr. Andrew Schenker  
Chief Executive Officer  
Thrive World Wide, Inc.  
638 Main Street  
Lake Geneva, Wisconsin 53147

**Re: Thrive World Wide, Inc.**  
**Form 10-KSB for Fiscal Year Ended September 30, 2008**  
**Filed February 13, 2009**  
**Commission File No. 333-127597**

Dear Mr. Schenker:

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

Sincerely,

Jennifer Thompson  
Branch Chief