



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 3720

May 29, 2009

Michael E. Weksel  
Alyst Acquisition Corp.  
233 East 69th Street, Suite 6J  
New York, NY 10021

**Re: Alyst Acquisition Corp.  
Revised Preliminary Proxy Statement on Schedule 14A  
Filed May 29, 2009  
File No. 001-33563**

Dear Mr. Weksel:

We have completed our review of your Preliminary Proxy Statement on Schedule 14A and related filings and have no further comments at this time.

Sincerely,

/s/ Celeste M. Murphy

Celeste M. Murphy  
Legal Branch Chief

cc: by facsimile to (212) 547-5444  
Barbara A. Jones, Esq.  
Peter J. Rooney, Esq.  
(McDermott Will & Emery LLP)