

Mail Stop 4561

August 30, 2007

Gordon F. DuGan
Chief Executive Officer
Corporate Property Associates 17 - Global Incorporated
50 Rockefeller Plaza
New York, New York 10020

**Re: Corporate Property Associates 17 - Global Incorporated
Amendment No. 2 to Form S-11
Filed on August 13, 2007
File No. 333-140842**

Dear Mr. DuGan:

We have reviewed your filing and have the following comments. Where indicated, we think you should revise your document in response to these comments. If you disagree, we will consider your explanation as to why our comment is inapplicable or a revision is unnecessary. Please be as detailed as necessary in your explanation. In some of our comments, we may ask you to provide us with supplemental information so we may better understand your disclosure. After reviewing this information, we may or may not raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comments or any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

All page numbers refer to the marked courtesy copy of the registration statement that you provided to us.

General Comments

1. We note your response to prior comment 3 in your letter dated June 22, 2007. Please confirm whether you will submit a written request for exemptive or no-action relief to the Division of Market Regulation under Rule 102 of Regulation M in connection with your proposed share repurchase program. Refer to Rule 102(e) of Regulation M. Also, please revise the disclosure regarding your redemption program to clarify that you will not accept shares for redemption until you have obtained relief.

Financial Statements

Note 2 – Summary of Significant Accounting Policies

Basis of Consolidation, page F-6

2. Please expand your disclosure to clarify the basis for consolidating your investment in the operating partnership under FIN 46(R).

As appropriate, please amend your registration statement in response to these comments. You may wish to provide us with marked copies of the amendment to expedite our review. Please furnish a cover letter with your amendment that keys your responses to our comments and provides any requested supplemental information. Detailed cover letters greatly facilitate our review. Please understand that we may have additional comments after reviewing your amendment and responses to our comments.

We will consider a written request for acceleration of the effective date of the registration statement as a confirmation of the fact that those requesting acceleration are aware of their respective responsibilities under the Securities Act of 1933 and the Securities Exchange Act of 1934 as they relate to the proposed public offering of the securities specified in the above registration statement. We will act on the request and, pursuant to delegated authority, grant acceleration of the effective date.

We direct your attention to Rules 460 and 461 regarding requesting acceleration of a registration statement. Please allow adequate time after the filing of any amendment for further review before submitting a request for acceleration. Please provide this request at least two business days in advance of the requested effective date.

You may contact Yolanda Crittendon, Accountant, at (202) 551-3472 or Cicely LaMothe, Accounting Branch Chief, at (202) 551-3413 if you have questions regarding comments on the financial statements and related matters. Please contact David Roberts, Staff Attorney, at (202) 551-3856 or the undersigned at (202) 551-3780 with any other questions.

Sincerely,

Karen J. Garnett
Assistant Director

cc: Kathleen Werner, Esq. (*via facsimile*)
Clifford Chance US LLP

Gordon F. DuGan
Corporate Property Associates 17 - Global Incorporated
August 30, 2007
Page 3