



DIVISION OF
CORPORATION FINANCE

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

March 8, 2011

Mr. D. Kirk McAllaster, Jr.
Executive Vice President, Chief Financial Officer
Cole Credit Property Trust III, Inc.
2555 East Camelback Road, Suite 400
Phoenix, Arizona 85016

Re: Cole Credit Property Trust III, Inc.
Form 10-K for the year ended December 31, 2009
Filed on March 29, 2010
Proxy Statement on Schedule 14A
Filed on April 7, 2010
File No. 333-149290

Dear Mr. McAllaster, Jr.:

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

Sincerely,

Sonia Barros
Special Counsel

cc: Lauren B. Prevost (*via facsimile*)