



DIVISION OF
CORPORATION FINANCE

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

April 28, 2011

Alan F. Feldman
Chief Executive Officer
Resource Real Estate Opportunity REIT, Inc.
Once Crescent Drive, Suite 203
Philadelphia, Pennsylvania 19112

Re: Resource Real Estate Opportunity REIT, Inc.
Form 10-K for the fiscal year ended December 31, 2010
Filed March 30, 2011
File No. 333-160463

Dear Mr. Feldman:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

Michael McTiernan
Assistant Director

cc: Robert Bergdolt, Esq.
DLA Piper LLP (US)
Via *facsimile*: (919) 786-2200