



DIVISION OF  
CORPORATION FINANCE

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

June 11, 2012

Via Facsimile

Guy Archbold, Chief Executive Officer  
Rackwise, Inc.  
2365 Iron Point Road, Suite 190  
Folsom, CA 95630

**Re: Rackwise, Inc. (f/k/a Visual Network Design, Inc.)  
Current Report on Form 8-K  
Initially filed on September 27, 2011  
File No. 333-163172**

Dear Mr. Archbold:

We have completed our review of the above-referenced 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 your filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Katherine Wray

Katherine Wray  
Attorney-Advisor

cc: Via E-Mail  
Adam S. Gottbetter  
Gottbetter & Partners, LLP