



DIVISION OF  
CORPORATION FINANCE

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

October 12, 2018

James Bedal  
Chief Executive Officer  
Bare Metal Standard, Inc.  
3604 S. Banner St.  
Boise, ID 83709

**Re: Bare Metal Standard, Inc.**  
**Post-Effective Amendment to Form S-1**  
**Filed September 27, 2018**  
**File No. 333-210321**

Dear Mr. Bedal:

We have reviewed your post-effective amendment and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by amending your registration statement and providing the requested information. If you do not believe our comments apply to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your registration statement and the information you provide in response to these comments, we may have additional comments.

Post-effective amendment filed September 27, 2018

General

1. We note that you filed post-effective amendment no. 1, dated March 29, 2017, to this registration statement for the apparent purpose of deregistering all unsold securities covered under this offering following the close of the offering on March 27, 2017. In addition, we note that there are outstanding comments on post-effective amendment no. 1 contained in our comment letter dated April 10, 2017. Please respond to those comments and, in doing so, please note that, if the offering is terminated, as disclosure in your first POSAM suggests, then a filing to deregister the unsold securities would be expected. If your intention is to revive a public offering that you indicated was closed in 2017, please

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file a new registration statement.

We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Sergio Chinos, Staff Attorney, at (202) 551-7844 or Jay Ingram, Legal Branch Chief, at (202) 551-3397 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Manufacturing and  
Construction

cc: Frederick C. Bauman