

Mail Stop 4561

May 10, 2007

Mr. Richard A. Bianco  
Chairman, President, and Chief Executive Officer  
Ambase Corporation  
100 Putnam Green  
3<sup>rd</sup> Floor  
Greenwich, CT 06830-6027

**Re: Ambase Corporation  
Form 10-K for the year ended December 31, 2006  
Filed March 29, 2007  
File No. 001-07265**

Dear Mr. Bianco:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Daniel L. Gordon  
Branch Chief

