

January 22, 2010

Mail Stop 3010

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

**Re: AmBase Corporation  
Form 10-K for the year ended December 31, 2008  
Filed March 27, 2009  
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