



DIVISION OF
CORPORATION FINANCE

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

April 28, 2011

Via E-mail

Mr. Jeffrey P. Devaney
Chief Financial Officer, Treasurer and Secretary
PASSUR Aerospace, Inc.
One Landmark Square, Suite 1900
Stamford, CT 06901

**Re: PASSUR Aerospace, Inc.
Form 10-K for the Fiscal Year Ended October 31, 2010
Filed January 31, 2011
File No. 000-07642**

Dear Mr. Devaney:

We have completed our review of your Form 10-K and related filings and have no further comments at this time on the specific issues raised.

Sincerely,

/s/ Patrick Gilmore

Patrick Gilmore
Accounting Branch Chief