

Mail Stop 3561

November 9, 2009

Via Fax & U.S. Mail

Mr. Patrick Carr
Chief Executive Officer
Diatect International Corporation
875 South Industrial Parkway
Heber City, Utah 84032

**Re: Diatect International Corporation
Form 10-K for the year ended December 31, 2008
Filed May 18, 2009**

**Form 10-K for the year ended December 31, 2007
Filed March 19, 2008
File No. 0-10147**

Dear Mr. Carr:

We issued comments to you on the above captioned filings on September 15, and September 22, 2009. As of this date of this letter, these comments remain outstanding and unresolved. We expect you to contact us by November 23, 2009 to provide a substantive response to these comments or to advise us why you are unable to respond and when you will be able to do so.

If you do not respond to the outstanding comments or contact us by November 23, 2009, we will, consistent with our obligations under the federal securities laws, decide how we will seek to resolve material outstanding comments and complete our review of your filings and your disclosure. Among other things, we may decide to release publicly, through the agency's EDGAR system, all correspondence, including this letter, relating to the review of your filing, consistent with the staff's decision to release publicly comment letters and response letters relating to disclosure filings it has reviewed. You can find more information about the staff's decision to release filing correspondence at <http://www.sec.gov/news/press/2004-89.htm> and <http://www.sec.gov/news/press/2005-72.htm>.

Mr. Patrick Carr
Diatect International Corporation
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Please contact me at (202) 551-3813 with any other questions.

Sincerely,

Linda Cvrkel
Branch Chief

Via Fax: William Paul
(813) 276-1560