

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549-4631

Mail Stop 4631

February 23, 2010

Via U.S. mail and facsimile

Mr. Scott Schweinfurth Executive Vice President and Chief Financial Officer WMS Industries Inc. 800 South Northpoint Blvd. Waukegan, IL 60085

> RE: Form 10-K for the year ended June 30, 2009 Form 10-Q for the period ended September 30, 2009

Definitive Proxy Statement on Schedule 14A filed October 27, 2009

File No. 001-08300

Dear Mr. Schweinfurth:

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

If you have any questions regarding our review of your filings, you may contact Era Anagnosti, Staff Attorney, at (202) 551-3369 or, in her absence, Andrew Schoeffler, Senior Staff Attorney, at (202) 551-3748 regarding legal matters. Please contact Lisa Haynes, Staff Accountant, at (202) 551-3424 or, in her absence, the undersigned at (202) 551-3689 if you have questions regarding comments on the financial statements and related matters.

Sincerely,

John Hartz Senior Assistant Chief Accountant