December 19, 2006

Mail Stop 4561

Mr. Ned Mavrommatis Chief Financial Officer I.D. Systems, Inc. One University Plaza Hackensack, NJ 07601

Re: I.D. Systems, Inc.

Form 10-K for the year ended December 31, 2005

Filed February 22, 2006

File No. 1-15087

Dear Mr. Mavrommatis:

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

Sincerely,

Steven Jacobs Accounting Branch Chief