VIA U.S. MAIL AND FAX (718) 935-0378

Mr. Lloyd J. Shulman Chief Executive Officer J.W. Mays, Inc. 9 Bond Street Brooklyn, NY 11201-5805

Re: J.W. Mays, Inc.

Form 10-K for the fiscal year ended July 31, 2009

Filed October 8, 2009 File No. 001-3647

Dear Mr. Shulman:

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

Sincerely,

Daniel L. Gordon *Branch Chief*