



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

February 18, 2009

Mr. Kenneth R. Ring  
Deutsche Bank Trust Company Americas, Trustee  
Trust & Securities Services – GDS  
60 Wall Street, 27th Floor  
New York, NY 10005

**Re: Mesabi Trust**  
**Form 10-K for the fiscal year ended January 31, 2008**  
**Filed April 11, 2008**  
**File No. 1-04488**

Dear Mr. Ring:

We have completed our review of your annual report and have no further comments at this time.

Sincerely,

H. Roger Schwall  
Assistant Director

cc: Thomas R. Marek, Esq. (612) 607-7100