



DIVISION OF  
CORPORATION FINANCE

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

February 23, 2011

Mr. Kenneth R. Ring  
Mesabi Trust  
c/o 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 Fiscal Year Ended January 31, 2010**  
**Filed April 15, 2010**  
**Response Filed February 11, 2011**  
**File No. 1-04488**

Dear Mr. Ring:

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

Sincerely,

Ethan Horowitz  
Branch Chief