

Mail Stop 4561
Via Fax (972) 720-1900

November 20, 2008

Robert C. Shreve
Chief Executive Officer and
Chief Financial Officer
Avatar Systems, Inc.
2801 Network Blvd., Suite 210
Frisco, Texas 75034

Re: Avatar Systems, Inc.
Form 10-KSB for the Fiscal Year Ended December 31, 2007
Filed on April 4, 2008
Forms 10-Q for the Quarters Ended March 31, 2008
and June 30, 2008
File No. 000-32925

Dear Mr. Shreve:

We have completed our review of your Form 10-KSB and related filings and have no further comments at this time on the specific issues raised.

Sincerely,

Kathleen Collins
Accounting Branch Chief