



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

Mail Stop 4561

July 30, 2009

Rodney Schutt
Chief Executive Officer
Aspyra, Inc.
26115-A Mureau Road
Calabasas, CA 91302

Re: Aspyra, Inc.
Revised Preliminary Information Statement on Schedule 14C
Filed July 29, 2009
File No. 001-13268

Dear Mr. Schutt:

We have completed our review of the above-referenced filing and have no further comments at this time.

Sincerely,

Maryse Mills-Apenteng
Special Counsel

cc: Via facsimile (818) 449-8702
Ana Villafane, Esq.