



DIVISION OF
CORPORATION FINANCE

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

Mail Stop 4561

January 29, 2010

Rodney W. Schutt
Chief Executive Officer
Aspyra, Inc.
4360 Park Terrace Drive, Suite 220
Westlake Village, CA 91361

Re: Aspyra, Inc.
Preliminary Revised Proxy Statement on Schedule 14A
Filed January 27, 2010
File No. 001-13268

Preliminary Revised Transaction Statement on Schedule 13E-3
Filed January 27, 2010
File No. 005-34708

Dear Mr. Schutt:

We have completed our review of your Preliminary Proxy Statement and Preliminary Transaction Statement and related filings and have no further comments at this time.

Sincerely,

Maryse Mills-Apenteng
Special Counsel