

Mail Stop 4561

October 8, 2009

Ronald C. Lundy  
Vice President of Finance and  
Chief Financial Officer  
Veramark Technologies, Inc.  
3750 Monroe Avenue  
Pittsford, NY 14534

**Re: Veramark Technologies, Inc.  
Form 8-K Filed October 10, 2009  
File No. 000-13898**

Dear Mr. Lundy:

We have reviewed the above referenced filing and have the following comment. Please note that we have limited our review to the matters addressed in the comment below. If indicated, we think you should revise your document in response to this comment. If you disagree, we will consider your explanation as to why our comment is inapplicable or a revision is unnecessary. Please be as detailed as necessary in your explanation. In our comment, we may ask you to provide us with supplemental information so we may better understand your disclosure. After reviewing this information, we may raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comment or any other aspect of our review. Feel free to call us at the telephone number at the end of this letter.

Form 8-K Filed October 5, 2009

Item 4.01 Changes in Registrant's Certifying Accountant

1. We note that your former independent accountants, Rotenberg and Company LLP, merged with another accounting firm to form EFP Rotenberg LLP ("EFP"). Irrespective of whether the partners and employees of Rotenberg and Company LLP became partners and employees of EFP, you must disclose the information required by Item 304 of Regulation S-K, as this merger appears to be a change in accountants. Refer to Item 4.01 of Form 8-K. Also, tell us when EFP anticipates becoming registered with the PCAOB.

\* \* \* \* \*

Please respond to these comments within 5 business days or tell us when you will provide us with a response. Please submit all correspondence and supplemental materials on EDGAR as required by Rule 101 of Regulation S-T. If you amend your filing, you may wish to provide us with marked copies of any amendment to expedite our review. Please furnish a cover letter that keys your response to our comments and provides any requested information. Detailed cover letters greatly facilitate our review. Please understand that we may have additional comments after reviewing any amendment and your response to our comment.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes all information required under the Securities Exchange Act of 1934 and that they have provided all information investors require for an informed investment decision. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In connection with responding to our comment, please provide, in writing, a statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filing; and
- the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filing or in response to our comments on your filing.

You may contact me at (202) 551-3459 if you have any questions regarding the above comments.

Sincerely,

David Edgar  
Staff Accountant