

November 16, 2005

Mail Stop 4561

VIA U.S. MAIL AND FAX (864) 233-6067

Mr. Bill Franks
Principal Financial Officer
Palmetto Real Estate Trust
45 Liberty Lane
Greenville, SC 29067

**Re: Palmetto Real Estate Trust
Form 10-KSB for the year ended December 31, 2004
Filed March 31, 2005
File No. 000-00179**

Dear Mr. Franks:

We have completed our review of your Form 10-KSB and related filings and do not, at this time, have any further comments.

Sincerely,

Steven Jacobs
Accounting Branch Chief