

Mail Stop 6010

October 15, 2007

William B. Horne
Chief Executive Officer
Patient Safety Technologies, Inc.
27555 Ynez Road, Suite 330
Temecula, CA 92591

**Re: Patient Safety Technologies, Inc.
Annual Report on Form 10-K
for the fiscal year ended December 31, 2006
Filed May 16, 2007
File No. 001-09727**

Dear Mr. Horne:

We have reviewed your filing and have the following comments. Where indicated, we think you should revise your document in response to these comments. 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 some of our comments, we may ask you to provide us with 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 comments or any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

1. Please provide us with a detailed analysis as to whether the company or any of its subsidiaries was an investment company as of June 30, 2007.
2. In future filings, to the extent you present disclosure regarding Alacra's revenues, please balance such disclosure with similar disclosure regarding Alacra's net income or losses.

As appropriate, please amend your filings and respond to these comments within 10 business days or tell us when you will provide us with a response. You may wish to provide us with marked copies of the amendments to expedite our review. Please furnish a cover letter with your amendments that keys your responses to our comments and

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provides any requested information. Detailed cover letters greatly facilitate our review. Please understand that we may have additional comments after reviewing your amendments and responses to our comments.

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 comments, 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 Rochelle Kauffman Plesset at (202) 551-6840 if you have questions regarding comments on the investment company issues. Please contact Tom Jones at (202) 551-3602 or me at (202) 551-3635 with any other questions.

Sincerely,

Tim Buchmiller
Senior Attorney