WILLIAMS * SCHIFINO

WILLIAMS SCHIFINO MANGIONE & STEADY P.A. ATTORNEYS AT LAW

John J. Agliano

October 21, 2009

This firm represents Food Technology Service, Inc. (the "Company"). We have been requested to respond to the staff's letters of comment dated October 7, 2009 (the "1st

Comment Letter") and October 15, 2009 (collectively, the "Comment Letters"), relating

to the Company's Current Reports on Form 8-K, which were filed via EDGAR on October 6, 2009 (the "October 6th Report") and October 13, 2009 (the "October 13th

Initially, the Company filed the October 6th Report for the purposes of disclosing the

following two (2) events: (i) the August 4, 2009 termination of the engagement of the Company's independent accountant, Mr. John Faircloth (deceased), who was the sole

CPA and employee of Faircloth & Associates, P.A. (the "August 4th Event"), and (ii) the

September 21, 2009 engagement of the Company's new independent accountants, Ferlita, Walsh and Gonzalez, P.A. (the "September 21st Event"). However, as a result of the

staff's 1st Comment Letter, it was determined that the Company should have reported the

In response to staff's 1st Comment Letter, the Company filed the October 13th Report for the purpose of separately disclosing the August 4th Event, which Report also included the

Company's responses to certain comments raised by the staff in said Letter with respect

to such occurrence. Further, it was decided, in consultation with the staff, that it would not be necessary for the Company to file an amendment to its October 6th Report, since

said Report reflects all of the required disclosure with respect to the September 21st

Lina Angelici

VIA FACSIMILE (703) 813-6980

Jeffrey E. Appleang

Ta Tanisha Meadows

Jacqueline M. Bell

Staff Accountant

U.S. Securities and Exchange Commission

foregoing events in separate 8-K Reports.

Blake D. Bringgold

100 F Street, NE

V. Stephen Cohen

Washington, DC 20549

Daniel P. Diecrich

Re: Food Technology Service, Inc.

Report").

File No. 0-19047 - Current Reports on Form 8-K

Colleen E. Elrod

Dear Ms. Meadows:

Robin P. Keener

Joseph T. King

Allyson L. Lazzara

Rainh P. Mangione

R. Marshall Rainey

John D. Russell

John A. Schiffino

William J. Schiffing, Jr.

William J. Schifino. Sr.

Scott 1. Steady

Robert M. Stoler

Mary B. Thomas

Kennerh C. Turkel

Catherine M. Verona

Shane B. Vogt

Robert V. Williams

Matthew L Wilson

Nicole Zamora

Event. We believe this letter, together with the October 13th Report are fully responsive to the staff's Comment Letters. If you have any questions or further comments regarding the aforementioned events and/or filings, please do not hesitate to call the undersigned at (813) 221-2626.

Of Counsel

Scott Brown

Steven M. Samaha

Yours very truly,

William J. Schifino Sr.

WJS/mm

cc:

Food Technology Service, Inc.

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