



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 3720

November 6, 2007

Jose Gustavo Pozzi  
General Manager and Sole Officer of Nortel  
Nortel Inversora S.A.  
Alicia Moreau de Justo 50  
(C1107AAB)-Buenos Aires, Argentina

**Re: Nortel Inversora S.A. (Nortel Investments, Inc.)  
Form 20-F for the Fiscal Year Ended December 31, 2006  
Filed June 28, 2007**

**File No. 1-14270**

Dear Mr. Pozzi:

We have completed our review of your Form 20-F and do not, at this time, have any further comments.

Sincerely,

Larry Spigel  
Assistant Director