Mail Stop 3561

May 28, 2008

A.D. Frazier Chief Executive Officer Danka Business Systems PLC Masters House 107 Hammersmith Road London W14 0QH England

Re: Danka Business Systems PLC Proxy Statement on Schedule 14A File No. 0-20828

Dear Mr. Frazier:

We have completed our review of your Proxy Statement on Schedule 14A and have no further comments at this time.

Sincerely,

H. Christopher Owings Assistant Director

cc via facsimile:

Gary Cullen, Esq. (312) 407-8504