



DIVISION OF
CORPORATION FINANCE

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

September 23, 2011

Via Facsimile

Mr. Gabriel Saba D'jamus
Chief Executive Officer
Grupo Casa Saba, S.A.B. de C.V.
Paseo de la Reforma, No. 215
Colonia Lomas de Chapultepec
Mexico, D.F. 11000
Mexico

**Re: Grupo Casa Saba, S.A.B. de C.V.
Form 20-F/A for Fiscal Year Ended
December 31, 2010
Filed September 23, 2011
File No. 001-12632**

Dear Mr. D'jamus:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings 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. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Brian K. Bhandari

Brian K Bhandari
Branch Chief