



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

Mail Stop 3561

July 17, 2009

Via Fax & U.S. Mail

Mr. Andrew S. Prince
Chief Financial Officer
Precision Aerospace Components, Inc.
2200 Arthur Kill Road
Staten Island, New York 10309-1202

**Re: Precision Aerospace Components, Inc.
Form 10-KSB for the year ended December 31, 2007
Form 10-K for the year ended December 31, 2008
File No. 000-30185**

Dear Mr. Prince:

We issued comments to you on the above captioned filings on May 13, 2009. As of the date of this letter, these comments remain outstanding and unresolved. We expect you to contact us by July 31, 2009 to provide a substantive response to these comments.

If you do not respond to the outstanding comments by July 31, 2009, we will, consistent with our obligations under the federal securities laws, decide how we will seek to resolve material outstanding comments and complete our review of your filings and your disclosure. Among other things, we may decide to release publicly, through the agency's EDGAR system, all correspondence, including this letter, relating to the review of your filing, consistent with the staff's decision to release publicly comment letters and response letters relating to disclosure filings it has reviewed. You can find more information about the staff's decision to release filing correspondence at <http://www.sec.gov/news/press/2004-89.htm> and <http://www.sec.gov/news/press/2005-72.htm>.

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Please contact Amy Geddes at (202) 551-3304 if you have any questions.

Sincerely,

David R. Humphrey
Branch Chief