

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

DIVISION OF CORPORATION FINANCE

August 27, 2014

<u>Via E-mail</u> W. Austin Lewis, IV President PAID, Inc. 200 Friberg Parkway Westborough, Massachusetts 01581

Re: PAID, Inc. Preliminary Proxy Statement on Schedule 14A Filed August 13, 2014 File No. 000-28720

Dear Mr. Lewis:

We have completed our review of your filing. 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 filing 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 filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Lilyanna Peyser for

Mara L. Ransom Assistant Director

cc: Michael Refolo, Esq. Mirick O'Connell