



DIVISION OF  
CORPORATION FINANCE

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

November 29, 2010

Mr. Guy Bernstein  
Chief Executive Officer  
Formula Systems (1985) Ltd.  
5 Haplada Street  
Or Yehuda 60218, Israel

**Re: Formula Systems (1985) Ltd.  
Form 20-F and Form 20-F/A for the Fiscal Year Ended December 31, 2009  
Filed April 29, 2010 and May 10, 2010, respectively  
File No. 000-29442**

Dear Mr. Bernstein:

We have completed our review of your Form 20-F and related filings and have no further comments at this time on the specific issues raised.

Sincerely,

Kathleen Collins  
Accounting Branch Chief