



DIVISION OF
CORPORATION FINANCE

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

January 19, 2011

Anthony J. Cataldo
Chief Executive Officer
Oxis International, Inc.
468 N. Camden Dr., 2nd Floor
Beverly Hills, CA 90210

Re: Oxis International, Inc.
Form 10-K for the Fiscal Year Ended December 31, 2009
Filed March 30, 2010
File No. 000-08092

Dear Mr. Cataldo:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Jeffrey P. Riedler
Assistant Director

cc: Istvan Benko (TroyGould PC)