

Mail Stop 4561

January 5, 2009

Mr. Doron Roethler  
Principal Executive Officer  
Smart Online, Inc.  
4505 Emperor Blvd., Suite 320  
Durham, NC 27703

**Re: Smart Online, Inc.  
Form 10-K For the Year Ended December 31, 2007  
Filed on March 25, 2008  
Form 10-Q For the Quarter Ended June 30, 2008  
Filed on August 12, 2008  
File No. 001-32634**

Dear Mr. Roethler:

We have completed our review of the above referenced filings and have no further comments at this time on the specific issues raised.

Sincerely,

Stephen G. Krikorian  
Accounting Branch Chief

cc: Margaret N. Rosenfeld, Esq.  
via facsimile to (919) 821-6800