

## UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549-0404

Mail Stop 3551

February 10, 2009

## By Facsimile and U.S. Mail

Mr. Michael Jordan Friedman Chief Executive Officer Fresh Harvest Products, Inc. 280 Madison Avenue, Suite 1005 New York, NY 10016

Re: Fresh Harvest Products, Inc.

Form 10-KSB for the fiscal year ended October 31, 2007

Filed February 13, 2008

Form 10-QSB for the quarterly period ended January 31, 2008

Filed March 24, 2008

Form 10-Q for the quarterly period ended July 31, 2008

Filed September 22, 2008

File No. 000-51390

## Dear Mr. Friedman:

We issued comments to you on the above captioned filings on December 4, 2008. As of the date of this letter, these comments remain outstanding and unresolved. We expect you to contact us by February 25, 2009, to provide a substantive response to these comments or to advise us why you are unable to respond and when you will be able to do so.

If you do not respond to the outstanding comments or contact us by February 25, 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 <a href="http://www.sec.gov/news/press/2004-89.htm">http://www.sec.gov/news/press/2005-72.htm</a>.

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Please contact Scott Stringer at 202-551-3254 or me at (202) 551-3377 if you have any questions.

Sincerely, /s/Andrew Mew Andrew Mew Accounting Branch Chief