



DIVISION OF  
CORPORATION FINANCE  
Mail Stop 3720

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

September 17, 2009

Mr. Bernard Chan, Director, CEO, President and Treasurer  
Asia Document Transition, Inc.  
15D, Eton Building  
288 Des Voeux Road  
Central, Hong Kong

**RE: Asia Document Transition, Inc.  
Form 8-K filed on August 3, 2009  
File no. 33-139946**

Dear Mr. Chan:

We have completed our review of the above filing and do not, at this time, have any further comments.

Sincerely,

Terry French  
Accountant Branch Chief

