

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549-7010

VIA FACSIMILE AND U.S. MAIL

January 16, 2009

Tian Jia Chief Executive Officer and Chief Financial Officer Great Wall Builders Ltd. 2620 Fountainview # 115B Houston, Texas 77057

Re: Item 4.02 Forms 8-K and 8-K/A

Filed: November 12, 2008 and December 23, 2008

Re: Form 10-Q/A

Filed: November 24, 2008 and January 14, 2009

File No. 333-153182

Dear Ms. Jia:

We have completed our review of your Form 8-K and related filings and have no further comments at this time.

If you have any further questions regarding our review of your filings, please direct them to Ernest Greene, Staff Accountant, at (202) 551-3733 or in his absence, to the undersigned at (202) 551-3769.

Sincerely,

Rufus Decker Accounting Branch Chief