Via Fax & U.S. Mail

Mr. Patrick Carr Chief Executive Officer Diatect International Corporation 875 South Industrial Parkway Heber City, Utah 84032

> Re: Diatect International Corporation Form 10-K for the year ended December 31, 2008 Filed May 18, 2009

> > Form 10-K for the year ended December 31, 2007 Filed March 19, 2008 File No. 0-10147

Dear Mr. Carr:

We issued comments to you on the above captioned filings on September 15, and September 22, 2009. As of this date of this letter, these comments remain outstanding and unresolved. We expect you to contact us by November 23, 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 November 23, 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 http://www.sec.gov/news/press/2005-72.htm.

Mr. Patrick Carr Diatect International Corporation November 9, 2009 Page 2

Please contact me at (202) 551-3813 with any other questions.

Sincerely,

Linda Cvrkel Branch Chief

Via Fax: William Paul (813) 276-1560