Mail Stop 4561 via fax (760) 598-0219

March 10, 2009

Ms. Linh Nguyen Chief Financial Officer International Lottery & Totalizator Systems, Inc. 2310 Cousteau Court Vista, VA 92081

Re: International Lottery & Totalizator Systems, Inc.

Form 10-KSB and Forms 10-KSB/A for the Fiscal Year

Ended April 30, 2008

Filed July 14, 2008, August 5, 2008 and March 10, 2008 respectively

File No. 000-10294

Dear Ms. Nguyen:

We have completed our review of your Form 10-K and related filings and have no further comments at this time on the specific issues raised.

Sincerely,

Kathleen Collins Accounting Branch Chief