November 10, 2009

Eric Claus, President and Chief Executive Officer The Great Atlantic & Pacific Tea Company, Inc. 2 Paragon Drive Montvale, New Jersey 07645

Re: The Great Atlantic & Pacific Tea Company, Inc.
Preliminary Proxy Statement on Schedule 14A, as revised
Filed September 1, 2009
File No. 001-04141

Dear Mr. Claus:

We have completed our review of your preliminary proxy statement on Schedule 14A and have no further comments at this time.

Sincerely,

H. Christopher Owings Assistant Director