

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

DIVISION OF CORPORATION FINANCE

October 7, 2021

Jessica L. Thomas Chief Financial Officer and Secretary MECHANICAL TECHNOLOGY INC 325 Washington Avenue Extension Albany, New York 12205

Re: MECHANICAL TECHNOLOGY INC Preliminary Proxy Statement on Schedule 14A Filed August 30, 2021 File No. 001-40261

Dear Ms. Thomas:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance Office of Life Sciences

cc: Penny Somer-Greif, Esq.