



DIVISION OF
CORPORATION FINANCE

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

February 18, 2009

Mr. Kenneth R. Ring
Deutsche Bank Trust Company Americas, Trustee
Trust & Securities Services – GDS
60 Wall Street, 27th Floor
New York, NY 10005

Re: Mesabi Trust
Form 10-K for the fiscal year ended January 31, 2008
Filed April 11, 2008
File No. 1-04488

Dear Mr. Ring:

We have completed our review of your annual report and have no further comments at this time.

Sincerely,

H. Roger Schwall
Assistant Director

cc: Thomas R. Marek, Esq. (612) 607-7100