



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

Mail Stop 4561

July 30, 2009

Rodney Schutt  
Chief Executive Officer  
Aspyra, Inc.  
26115-A Mureau Road  
Calabasas, CA 91302

**Re: Aspyra, Inc.**  
**Revised Preliminary Information Statement on Schedule 14C**  
**Filed July 29, 2009**  
**File No. 001-13268**

Dear Mr. Schutt:

We have completed our review of the above-referenced filing and have no further comments at this time.

Sincerely,

Maryse Mills-Apenteng  
Special Counsel

cc: Via facsimile (818) 449-8702  
Ana Villafane, Esq.