

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

Mail Stop 3030

December 17, 2008

Via U.S. Mail

Mr. J. Bruce Robinson Chief Executive Officer Zygo Corporation Laurel Brook Road Middlefield, CT 06455

Re: Zygo Corporation

Form 10-K for the fiscal year ended June 30, 2008

File No. 0-12944

Dear Mr. Robinson:

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

Sincerely,

Kevin L. Vaughn Accounting Branch Chief