



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

DIVISION OF
CORPORATION FINANCE

September 27, 2011

Via Email

Stratton J. Nicolaides
Chairman and Chief Executive Officer
Numerex Corp.
1600 Parkwood Circle, Suite 500
Atlanta, GA 30339-2119

**Re: Numerex Corp.
Form 10-K for the fiscal year ended December 31, 2010
Filed March 30, 2011
File No. 000-22920**

Dear Mr. Nicolaides:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Larry Spiegel

Larry Spiegel
Assistant Director

cc: Via Email
Richard E. Baltz
Arnold & Porter LLP