Mail Stop 3010

Mr. Barry N. Berlin Chief Financial Officer PMC Commercial Trust 17950 Preston Road, Suite 600 Dallas, TX 75252

**Re:** PMC Commercial Trust

Form 10-K for the year ended December 31, 2008

Filed March 16, 2009 File No. 001-13610

Dear Mr. Berlin:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Daniel L. Gordon Branch Chief