



DIVISION OF
CORPORATION FINANCE

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

February 23, 2011

Mr. Kenneth R. Ring
Mesabi Trust
c/o 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 Fiscal Year Ended January 31, 2010
Filed April 15, 2010
Response Filed February 11, 2011
File No. 1-04488

Dear Mr. Ring:

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

Sincerely,

Ethan Horowitz
Branch Chief