POSITRON CORP Form RW WD November 10, 2010

November 9, 2010

Via EDGAR Only

Securities and Exchange Commission Division of Corporation Finance 100 F Street, N.E. Washington, D.C. 20549

Re: Positron Corporation

Registration Statement on Form SB-2

File No. 333-145217

Request for Withdrawal of Withdrawal Request

Ladies and Gentlemen:

Positron Corporation (the "Company") hereby requests that its withdrawal request with respect to the Registration Statement on Form SB-2 (File No. 333-145217), made pursuant to Rule 477 of the Securities Act of 1933, as amended (the "Securities Act"), be withdrawn. The Company is withdrawing the withdrawal request as it has been advised by the Commission that the request was not signed in accordance with Rule 477 of the Securities Act.

Should you have any questions, please call the undersigned at (866) 613-7587 or Peter Campitiello, Esq., at Tarter Krinsky & Drogin LLP at (212) 216-8085.

Sincerely,

POSITRON CORPORATION

By: /s/ Patrick G. Rooney

Patrick G. Rooney

Chief Executive Officer and Chairman of the

Board

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