

DIVISION OF CORPORATION FINANCE

Mail Stop 3561

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

December 13, 2016

Tony Isaac Chief Executive Officer Appliance Recycling Centers of America, Inc. 175 Jackson Avenue North Suite 102 Minneapolis, Minnesota 55343-4565

> Re: Appliance Recycling Centers of America, Inc. Preliminary Information Statement on Schedule 14A Filed November 1, 2016 File No. 000-19621

Dear Mr. Isaac:

As of November 23, 2016 we have no further comments and have completed our review of your filings. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ Lisa M. Kohl for

Mara L. Ransom Assistant Director Office of Consumer Products