



Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549

Attention: H. Christopher Owings, Assistant Director  
Peggy Kim, Senior Attorney  
Anita Karu, Attorney-Advisor

April 23, 2007

Re: **Acceleration Request**  
**Ocean Power Technologies, Inc. (the "Company")**  
**Registration Statement on Form S-1**  
**File No. 333-138595**

Dear Ladies and Gentlemen:

Pursuant to Rule 460 of the General Rules and Regulations under the Securities Act of 1933 (the "**Act**"), we, as representatives of the several Underwriters, wish to advise you that we have effected the following distribution of the Company's Preliminary Prospectus issued April 9, 2007 through the date hereof, estimated as follows:

Preliminary Prospectus dated April 9, 2007:

579 to Underwriters

5,822 to Institutions

63 to Dealers

7,288 to Others

Total: 13,752

We were advised on April 18, 2007 by the Corporate Financing Department of the National Association of Securities Dealers, Inc. that it has reviewed the above-captioned proposed offering and that it has determined to raise no objections with respect to the fairness of the terms and arrangements of the offering.

In accordance with Rule 461 of the Act, we hereby join in the request of Ocean Power Technologies, Inc. for acceleration of the effective date of the above-named Registration Statement so that it becomes effective at 2:00 p.m. Eastern Daylight Time on April 24, 2007, or as soon thereafter as practicable.

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Very truly yours,

UBS SECURITIES LLC  
BANC OF AMERICA SECURITIES LLC  
BEAR, STEARNS & CO. INC.

Acting severally on behalf of themselves  
and as representatives of the several  
Underwriters

By: UBS Securities LLC

By: /s/ DANIEL H. FLEISCHER

Name: Daniel H. Fleischer  
Title: Director

By: /s/ WALTER HULSE

Name: Walter Hulse  
Title: Managing Director