



Corporate Property Associates 17 – Global Incorporated

January 22, 2008

VIA E-MAIL (rule-comments@sec.gov)

Ms. Nancy M. Morris, Secretary
U.S. Securities and Exchange Commission
100 F Street, Northeast
Washington, D.C. 20549-1090

Re: Proposal to Permit Historical Incorporation by Reference Forms S-11
File No. S7-30-07

Dear Ms. Morris:

We appreciate the opportunity to comment on the proposal (the “Proposal”) issued by the U.S. Securities and Exchange Commission (the “Commission”) in Release No. 33-8871 (December 14, 2007), 72 Fed. Reg. 72,274 (December 20, 2007) (the “Release”). The Proposal would amend the incorporation by reference rules applicable to Form S-11 to conform such rules to those applicable to Forms S-1 and F-1 and to permit qualified registrants to incorporate by reference information previously filed in reports under the Securities Exchange Act of 1934 (the “Exchange Act”).

We applaud the Commission’s efforts to enhance the quality of the documents being provided to investors by improving their readability, while at the same time simplifying and enhancing the capital formation process for real estate companies by providing a more efficient and cost effective offering process.

By way of background, the current provisions of Guide 5, Preparation of Registration Statements Relating to Interests in Real Estate Limited Partnerships (“Guide 5”) require us to (i) file a sticker supplement to our prospectus describing each property not previously identified in our prospectus at such time as there arises a reasonable probability that such property will be acquired (the “Sticker Supplement”) and (ii) consolidate all such stickers into a post-effective amendment (the “Post-Effective Amendment”) filed at least once every three months, with the information contained in such Post-Effective Amendment provided simultaneously to the existing shareholders. Our sponsor has organized six other public REITs which were subject to the provisions of Guide 5 and based on its experience, we are aware that during a usual two year offering period we can expect to file at least eight Post-Effective Amendments and more than 20 Sticker Supplements. Near the end of an offering, we would expect the registration statement to be 300 pages or even more, potentially making the document difficult to read.

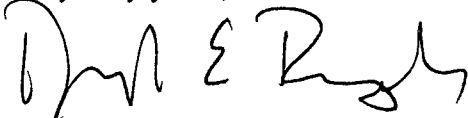
The substantial costs to S-11 filers is due in large part to the redundancy of what needs to be filed because of the inability to incorporate by reference. Registrants must file property information in Forms 8-K; then they file the same information in a Sticker Supplement;

then again when the Sticker Supplements are consolidated in a Post-Effective Amendment; and then in all future Post-Effective Amendments. The same duplication applies to other information contained in various reports. The significant expenses resulting from this process include the fees of outside counsel who prepare or review each of our filings and the costs of printing and postage. We do not believe that the time and money expended in this process enhances the disclosure to investors - in fact, quite the opposite. We think the prospectus becomes more and more difficult to read. We firmly believe that incorporation by reference should significantly reduce the size of the prospectus and make it more readable, while substantially reducing the costs incurred in connection with raising capital (which savings can be passed onto investors).

Investors will continue to be protected because they can access the information on both the SEC website and on our own website. They can access the information on the websites as or more quickly than they are presently receiving it through delivery of the prospectus. There will be no additional cost from the requirement in the Proposal that we include the reports on our website because we already post all such reports.

We applaud and fully support the Proposal and believe its adoption will enhance capital formation, improve the readability of prospectuses and significantly reduce the cost of compliance - all to the benefit of both shareholders and the companies in which they invest.

Very truly yours,



Douglas E. Barzelay

General Counsel