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ASA LTD Form 13F-HR February 07, 2011

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

FORM 13F

FORM 13F COVER PAGE

Report f	for the Calendar Year o	r Quarter Ended:	December 31,	2010			
Check he	ere if Amendment [];	Amendment Numb	per:				
This Ame	endment (Check only one		atement. noldings entries				
Institut	ional Investment Manag	ger Filing this Repo	ort:				
Name: Address:	ASA Limited : 400 S. El Camino Real, Suite 710, San Mateo, CA 94402-1708						
Form 13F	File Number: 28-11034						
it is si to subm complete	citutional investment igned hereby represent it, that all infe, and that it is unes, lists, and tables,	that the person sommation contained aderstood that all	signing the repo d herein is true required item	rt is authorized e, correct and ms, statements,			
Person S	Signing this Report on	Behalf of Reporting	ß Manager:				
Title:	Rodney D. Yee Chief Operating Office 650-376-3135	er, Chief Financial	Officer & Treas	urer			
Signatur	ce, Place, and Date of	Signing:					
	NEY YEE	SAN MATEO, CA		FEBRUARY 7, 2011			
	[Signature]	[City, State]		[Date]			
Report I	Type (Check only one):						
[X]	13F HOLDINGS REPORT. (reporting manager are		-				
[]	13F NOTICE. (Check he holdings are reported	-	-	report, and all			
[]	13F COMBINATION REPOR	RT. (Check here if a	portion of the	holdings for			

this reporting manager are reported in this report and a portion are

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reported by other reporting manager(s).)

Form 13F SUMMARY PAGE

Report Summary:

Number of Other Included Managers: 0

Form 13F Information Table Entry Total: 16

Form 13F Information Table Value Total: \$399,462 (thousands)

List of Other Included Managers:

Provide a numbered list of the name(s) and Form 13f file number(s) of all institutional investment managers with respect to which this report is filed, other than the manager filing this report.

[If there are no entries in this list, state "NONE" and omit the column headings and list entries.]

None

FORM 13F INFORMATION TABLE

COLUMN 1	COLUMN 2	COLUMN 3	COLUMN	4 CO:	LUMN 5		COLUMN 6	С
NAME OF ISSUER	TITLE OF CLASS	CUSIP	VALUE (x\$1000	SHARES/) PRN AMT		PUT/ CALL	INVESTMENT DISCRETION	_
Agnico-Eagle Mines Ltd	COM	008474108	40,268	525,000	SH		Sole	
Barrick Gold Corp	COM	067901108	69,134	1,300,000	SH		Sole	
Compania de Minas Buenaventura	Sponsored ADR	204448104	46,953	959,000	SH		Sole	
Eldorado Gold Corp.	COM	284902103	12,071	650,000	SH		Sole	
ETFS Palladium Trust	Sh Ben Int	26923A106	3,194	40,000	SH		Sole	
ETFS Platinum Trust	SH Ben Int	26922V101	1,761	10,000	SH		Sole	

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Goldcorp Inc. New	COM	380956409	49,769	1,082,400	SH	Sole
Golden Star Res Ltd CDA	COM	38119T104	3,443	750,000	SH	Sole
IAMGOLD Corp	COM	450913108	10,680	600,000	SH	Sole
Kinross Gold Corp	COM No Par	496902404	21,330	1,125,000	SH	Sole
Newmont Mining Corp	COM	651639106	31,966	520,368	SH	Sole
NovaGold Res Inc.	Note 5.5% 5/0	66987EAA5	7 , 850	5,000,000	PRN	Sole
NovaGold Res Inc.	COM New	66987E206	32 , 931	2,307,691	SH	Sole
Randgold Res Ltd	ADR	752344309	48,962	594,700	SH	Sole
Nes dea	71510	702011005	10,302	031,700	511	5010
Royal Gold Inc.	COM	780287108	11,472	210,000	SH	Sole