

AMERICAN AXLE & MANUFACTURING HOLDINGS INC
Form DEL AM
October 20, 2009

[Letterhead of American Axle & Manufacturing, Inc.]

October 20, 2009

Via EDGAR

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

Re: American Axle & Manufacturing, Inc. Registration Statement (File No. 333-162550) and American Axle & Manufacturing Holdings, Inc. Registration Statement (File No. 333-162550-01)

Ladies and Gentlemen:

Reference is made to the Registration Statements on Form S-3 (File No. 333-162550 and File No. 333-162550-01) filed with the Securities and Exchange Commission by American Axle & Manufacturing, Inc. and American Axle & Manufacturing Holdings, Inc. on October 16, 2009 (the Registration Statements). Pursuant to Rule 473(c) of the Securities Act of 1933, as amended (the Act), the following delaying amendment, prescribed by Rule 473(a) of the Act, is hereby incorporated onto the cover page of the Registration Statements immediately following the calculation of registration fee table:

The registrant hereby amends this registration statement on such date or dates as may be necessary to delay its effective date until the registrant shall file a further amendment which specifically states that this registration statement shall thereafter become effective in accordance with Section 8(a) of the Securities Act of 1933 or until the registration statement shall become effective on such date as the Commission acting pursuant to said Section 8(a), may determine.

If you have any questions, please contact Lisa L. Jacobs, Esq. of Shearman & Sterling LLP, our outside counsel, at (212) 848-7678.

Sincerely,

AMERICAN AXLE & MANUFACTURING, INC.
AMERICAN AXLE & MANUFACTURING
HOLDINGS, INC.

By: /s/ Michael K. Simonte
Michael K. Simonte
Executive Vice President
Finance & Chief Financial Officer