



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-4631

October 15, 2014

Via E-mail

Mr. Calvin E. Jenness
Chief Financial Officer
Blount International, Inc.
4909 SE International Way
Portland, OR 97222-4679

Re: Blount International, Inc.
Form 10-K for Fiscal Year Ended December 31, 2014
Filed April 23, 2014
Definitive Proxy on Form 14A
Filed April 30, 2014
File No. 1-11549

Dear Mr. Jenness:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Terence O'Brien

Terence O'Brien
Branch Chief