

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

April 11, 2022

Donald Newman Chief Financial Officer ALLEGHENY TECHNOLOGIES INC 1000 Six PPG Place Pittsburgh, Pennsylvania 15222

> Re: ALLEGHENY TECHNOLOGIES INC Form 10-K for the Year Ended December 31, 2021 Form 8-K furnished February 2, 2022 File No. 001-12001

Dear Mr. Newman:

We have completed our review of your filings. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance Office of Manufacturing