



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-3561

January 13, 2011

Richard E. Dauch  
Chief Executive Officer  
American Axle & Manufacturing Holdings, Inc.  
One Dauch Drive  
Detroit, MI 48211-1198

**Re: American Axle & Manufacturing Holdings, Inc.  
Form 10-K for fiscal year ended December 31, 2009  
Filed February 22, 2010  
File No. 001-14303**

Dear Mr. Dauch:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

John Dana Brown  
Attorney Advisor