



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