



DIVISION OF  
CORPORATION FINANCE

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

May 1, 2018

Christopher May  
Vice President & Chief Financial Officer  
American Axle & Manufacturing Holdings Inc  
One Dauch Drive  
Detroit MI 48211

**Re: American Axle & Manufacturing Holdings Inc**  
**Form 10-K for Fiscal Year Ended December 31, 2017**  
**Filed February 16, 2018**  
**File No. 001-14303**

Dear Mr. May:

We have completed our review of your filing. 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.

Division of Corporation Finance  
Office of Transportation and Leisure