



DIVISION OF  
CORPORATION FINANCE

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

**VIA FACSIMILE AND U.S. MAIL**

August 13, 2009

Roy A. Rumbough  
Chief Financial Officer  
Lennox International, Inc.  
2140 Lake Park Blvd.  
Richardson, Texas 75080

**RE: Lennox International, Inc.  
Form 10-K for Fiscal Year Ended December 31, 2008  
Forms 10-Q for Fiscal Quarter Ended March 31, 2009 and  
June 30, 2009  
Definitive Proxy Statement filed April 17, 2009  
File No. 1-15149**

Dear Mr. Rumbough:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

If you have any further questions regarding our review of legal or disclosure matters in your filings, please direct them to Chambre Malone, Attorney, at (202) 551-3262 or, in her absence, Jay Ingram, Legal Branch Chief, at (202) 551-3397. Please contact Ernest Greene, Staff Accountant, at (202) 551-3733 or, in his absence, the undersigned at (202) 551-3689, if you have questions regarding our review of the financial statements and related matters.

Sincerely,

John Hartz  
Senior Assistant  
Chief Accountant