



DIVISION OF  
CORPORATION FINANCE

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

December 22, 2010

*via U.S. mail and facsimile to (330) 220-6006*

Mr. Robert L. Matejka, Senior Vice President and Chief Financial Officer  
RPM International Inc.  
P.O. Box 777  
2628 Pearl Road  
Medina, Ohio

**RE: RPM International Inc.**  
**Form 10-K for the fiscal year ended May 31, 2010**  
**File No. 1-14187**

Dear Mr. Matejka:

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

Sincerely,

Terence O'Brien  
Branch Chief