



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
**SECURITIES AND EXCHANGE COMMISSION**  
WASHINGTON, D.C. 20549-0402

Mail Stop 3561

October 16, 2009

ArvinMeritor, Inc.  
J.A. Craig-Chief Financial Officer  
2135 West Maple Road  
Troy, Michigan 48084

**Re: ArvinMertior, Inc.**  
**Form 10-K for the year ended September 30, 2008**  
**Filed November 21, 2008**  
**File Number: 001-15983**

Dear Mr. Craig:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

David R. Humphrey  
Branch Chief