



DIVISION OF
CORPORATION FINANCE

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

August 19, 2010

Mr. Steven E. Keller
Senior Vice President, General Counsel, and Secretary
Affinia Group Intermediate Holdings, Inc.
1101 Technology Drive
Ann Arbor, Michigan 48108

**Re: Affinia Group Intermediate Holdings, Inc.
Form 10-K for the Year Ended December 31, 2009
File No. 333-128166**

Dear Mr. Keller:

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

Sincerely,

David R. Humphrey
Branch Chief