



DIVISION OF
CORPORATION FINANCE

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

August 16, 2012

Via Email

Mr. Brett D. Pynnonen
General Counsel
Federal-Mogul Corporation
26555 Northwestern Highway
Southfield, Michigan 48033

Re: Federal-Mogul Corporation
Item 4.01 Form 8-K
Filed August 15, 2012
File No. 001-34029

Dear Mr. Pynnonen:

We have reviewed your filing and have the following comment. In our comment, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter within ten business days by amending your filing. If you do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your filing and the information you provide in response to this comment, we may have additional comments.

1. We note that the exhibit 16 letter from Ernst & Young LLP refers to your Item 4.01 8-K dated August 15, 2012. However, we note that the Item 4.01 8-K is dated August 9, 2012. Please revise to include an updated letter from Ernst & Young LLP referencing the 8-K dated August 9, 2012.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable Exchange Act rules require. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In connection with responding to our comments, please provide, in writing, a statement from the company acknowledging that:

Mr. Brett D. Pynnonen
Federal-Mogul Corporation
August 16, 2012
Page 2

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filing; and
- the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

If you have any questions, please call me at (202) 551-3624.

Sincerely,

/s/ Heather Clark

Heather Clark
Staff Accountant