



DIVISION OF
CORPORATION FINANCE

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

September 27, 2012

Via E-mail

Mr. Xiaolong Zhou, Chief Financial Officer
Asia Carbon Industries, Inc.
11E 86th Street, Suite 19B
New York NY 10005

Re: Asia Carbon Industries, Inc.
Form 10-K for the year ended December 31, 2011
Filed March 29, 2012
File No. 333-167090

Dear Mr. Zhou:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or 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. 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 rules require.

Sincerely,

/s/ John Cash

John Cash
Branch Chief