



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

DIVISION OF
CORPORATION FINANCE

Mail Stop 4631

March 15, 2017

Via Email

Mr. Tim Makowski, Controller
Advanced Drainage Systems, Inc.
4640 Trueman Boulevard
Hilliard, Ohio 43026

Re: Advanced Drainage Systems, Inc.
Form 10-K for the year ended March 31, 2016
Filed September 15, 2016
Form 10-K/A for the year ended March 31, 2016
Filed January 10, 2017
File No. 1-36557

Dear Mr. Makowski:

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

Please respond to these comments within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comments apply to your facts and circumstances, please tell us why in your response.

After reviewing your response to these comments, we may have additional comments.

Selling expenses, page 56

1. In future filings please quantify the impact of individual factors which contribute to the change in your expenses. Further, we note that you experienced an increase in bad debt expense. Please tell us whether this was the result of one significant customer or a general deterioration of your receivables balance.

General and administrative expenses, page 57

2. We note you state that the increase in your general and administrative expenses was primarily the result of significant increases in professional fees for accounting, audit, tax, legal and other professional fees incurred in connection with the restatement of your previously filed financial statements as part of the preparation of your Fiscal 2015 Form

Mr. Tim Makowski
Advanced Drainage Systems, Inc.
March 15, 2017
Page 2

10-K/A. It does not appear that you filed an amended Form 10-K for the year ended March 31, 2015. Please explain this disclosure to us or otherwise revise in future filings.

Working Capital, page 63

3. Your discussion of changes in working capital and operating cash flows is a recitation of information found on the balance sheet. Please revise future disclosures to provide a more complete discussion explaining why the components of working capital and operating cash flows changed from period to period.

Capital Expenditures, page 64

4. Please revise future disclosures to identify and discuss the areas or product lines where you have made capital expenditures to increase capacity.

We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

You may contact Mindy Hooker at (202) 551-3732, Kevin Stertzell at (202) 551-3273 or me at (202) 551-3768 with any questions.

Sincerely,

/s/ John Cash

John Cash
Accounting Branch Chief
Office of Manufacturing and
Construction