



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 3030

November 18, 2016

Matthew W. Geekie  
Senior Vice President, Secretary and General Counsel  
Graybar Electric Company, Inc.  
34 North Meramec Avenue  
St. Louis, Missouri 63105

**Re: Graybar Electric Company, Inc.  
Registration Statement on Form S-1  
Filed November 10, 2016  
File No. 333-214560**

Dear Mr. Geekie:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Brian Soares at (202) 551-3580 with any questions.

Sincerely,

/s/ Brian Soares for

Amanda Ravitz  
Assistant Director  
Office of Electronics and Machinery

cc: Robert J. Endicott, Esq.  
Bryan Cave, LLP