



DIVISION OF  
CORPORATION FINANCE  
Mail Stop 3030

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

December 3, 2009

Marliss D. Johnson  
Vice President  
Ampco-Pittsburgh Corporation  
600 Grant Street, Suite 4600  
Pittsburgh, PA 15219

**RE: Ampco-Pittsburgh Corporation**  
**Form 10-K for the fiscal year ended December 31, 2008**  
**Filed March 13, 2009**  
**File No. 001-898**

Dear Ms. Johnson:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Brian Cascio  
Accounting Branch Chief