



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 3030

February 8, 2018

Via E-mail

Maria Trainor  
General Counsel  
Ampco-Pittsburgh Corporation  
726 Bell Avenue, Suite 301  
Carnegie, Pennsylvania 15106

**Re: Ampco-Pittsburgh Corporation  
Registration Statement on Form S-3  
Filed January 19, 2018  
File No. 333-222626**

Dear Ms. Trainor:

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 Heather Percival at (202) 551-3498 with any questions.

Sincerely,

/s/ Heather Percival for

Amanda Ravitz  
Assistant Director  
Office of Electronics and Machinery

cc: David A. Edgar  
K&L Gates LLP