



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

Mail Stop 3561

November 18, 2009

Via U.S. Mail and Facsimile

John P. Waldron  
Vice President and Controller  
Navistar International Corporation  
4201 Winfield Road, P.O. Box 1488  
Warrenville, Illinois 60555

RE: Navistar International Corporation  
Form 10-K for the fiscal year ended October 31, 2008  
Form 10-K/A (Amendment No. 1) for the fiscal year ended  
October 31, 2008  
Form 10-Q for the quarterly period ended January 31, 2009  
Form 10-Q for the quarterly period ended April 30, 2009  
Definitive Proxy Statement on Schedule 14A

**File No. 001-09618**

Dear Mr. Waldron:

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

Sincerely,

Linda Cvrkel  
Branch Chief

Via facsimile: John P. Waldron, Vice President and Controller  
(630) 753-2200

