



DIVISION OF
CORPORATION FINANCE

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

Mail Stop 6010

November 26, 2007

Via U.S. Mail and Facsimile to (847) 498-9123

Dominic Romeo
Chief Financial Officer
Idex Corporation
630 Dundee Road
Northbrook, IL 60062

Re: Idex Corporation
Form 10-K for the Fiscal-Year Ended December 31, 2006
Filed March 1, 2007
File No. 001-10235

Dear Mr. Romeo:

We have reviewed your filing and have the following comments. We have limited our review to only your financial statements and related disclosures and do not intend to expand our review to other portions of your documents. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure. After reviewing this information, we may raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comments or any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

Form 10-K for the Fiscal Year-Ended December 31, 2006

Critical Accounting Policies, page 21

Share-based Compensation, page 22

1. We note the disclosure that you used an independent third party to assist in determining the assumptions used in your SFAS 123(R) valuation model. While in future filings management may elect to take full responsibility for valuing the equity instruments, if you choose to continue to refer to the expert in any capacity, please revise future filings, beginning with your next Form 10-Q, to name the independent third party. In addition, please note that if you intend to incorporate your Form 10-K by reference into any registration statement, you will be required to include the consent of the independent third party as an exhibit to the registration statement.

Note 1. Significant Accounting Policies, page 30

Revenue Recognition, page F-9

2. Your disclosure regarding revenue recognition is too vague. Expand future filings to describe your revenue recognition policy in greater detail. To the extent that policy differs among significant product lines, please make your disclosure product line specific. Details should be provided to the extent that policy differs among the various marketing venues used by the Company, i.e. distributors and direct sales force. Also, if the policies vary in different parts of the world those differences should be discussed. Provide details of discounts, return policies, post shipment obligations, customer acceptance, warranties, credits, rebates, and price protection or similar privileges and how these impact revenue recognition. Also provide an analysis that explains your revenue recognition practices and demonstrates that your policies are SAB 104 and SFAS 48 compliant.

Note 3. Goodwill and Intangible Assets, page 35

3. We note that during fiscal 2006 previously indefinite-lived intangible assets were reassessed to have definite lives. Please tell us what intangible assets were reassessed and how you determined that the intangible assets had finite useful lives. Also demonstrate that the assets subsequently determined to have a finite useful life were tested for impairment in accordance with paragraphs 16 and 17 of SFAS 142.
4. Additionally, we note that you allocated \$62 million of the purchase price of Banjo Corporation to an indefinite useful lived asset - trade name. Please tell us how you determined the fair value of the intangible asset in accordance with paragraph 9 of SFAS 142 and why you considered it to have an indefinite life.

Furthermore, please tell us how you determined the fair value of the other intangible assets acquired as part of the series of acquisitions described on page 41 and 42.

Note 11. Discontinued Operations, page 42

5. We note your discussion of the changes in financial statement line items from fiscal 2006 to fiscal 2005 in MD&A on page 16 does not provide a discussion of your discontinued operations or gain on sale of assets. In future filings, please revise to include a comparative analysis of the charges recorded, including a discussion of its impact on your operations.

As appropriate, please respond to these comments within 10 business days or tell us when you will provide us with a response. Please furnish a cover letter that keys your responses to our comments and provides any requested information. Detailed cover letters greatly facilitate our review. Please understand that we may have additional comments after reviewing your responses to our comments.

In connection with responding to our comments, please provide, in writing, a statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filing; and
- the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filing or in response to our comments on your filing.

You may contact Kevin Kuhar, Staff Accountant, at (202) 551-3662 or me at (202)-3554 if you have questions regarding these comments on the financial statements and related matters. In this regard, do not hesitate to contact Martin James, Senior Assistant Chief Accountant, at (202) 551-3671.

Sincerely,

Angela Crane
Branch Chief