



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

October 9, 2009

Via U.S. Mail and Facsimile (770-813-6158)

Martin Richenhagen  
Chairman, President and Chief Executive Officer  
Agco Corporation  
4205 River Green Parkway  
Duluth, GA 30096

**Re: Agco Corporation**  
**Form 10-K for the Fiscal Year Ended December 31, 2008**  
**Filed February 27, 2009**  
**File No. 1-12930**  
**Response Letter Filed September 17, 2009**

Dear Mr. Richenhagen:

We refer you to our comment letter dated August 26, 2009 regarding business contacts with Iran, Syria and Sudan. We have completed our review of this subject matter and have no further comments at this time.

Sincerely,

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Peggy Fisher  
Assistant Director  
Division of Corporation Finance