



DIVISION OF
CORPORATION FINANCE

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

November 1, 2013

Via E-mail

James J. Connor
President, Chief Executive Officer and Secretary
Tecumseh Products Company
5683 Hines Drive
Ann Arbor, MI 48108

Re: Tecumseh Products Company
Form 10-K for the Fiscal Year Ended December 31, 2012
Filed March 7, 2013
File No. 0-00452

Dear Mr. Connor:

We refer you to our comment letter dated September 24, 2013 regarding business contacts with Syria and Sudan. We have completed our review of this subject matter. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or 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. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Cecilia Blye

Cecilia Blye, Chief
Office of Global Security Risk

cc: Pamela Long
Assistant Director
Division of Corporation Finance