



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-4631

February 1, 2011

Mr. Christopher J. Stephens, Jr.  
Chief Financial Officer  
Barnes Group Inc.  
123 Main Street  
Bristol, Connecticut 06010

**Re: Form 10-K for the Fiscal Year Ended December 31, 2009**  
**Form 10-Q for the Period Ended September 30, 2010**  
**File No. 1-4801**

Dear Mr. Stephens:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Rufus Decker  
Accounting Branch Chief