



May 22, 2017

VIA EDGAR

Securities and Exchange Commission

Division of Corporation Finance

100 F Street, NE

Washington, DC 20549

Attention: Anne Nguyen Parker, Assistant Director, Office of Transportation and Leisure

Donald E. Field

**Re: TransDigm Group Incorporated**  
**Registration Statement on Form S-4 (Registration No. 333-217850)**

Ladies and Gentlemen:

On behalf of TransDigm Inc. and TransDigm Group Incorporated (together, "**TransDigm**"), the undersigned hereby requests, pursuant to Rule 461(a) promulgated under the Securities Act of 1933, that the Registration Statement on Form S-4 (File No. 333-217850) of TransDigm be declared effective at 2:00 p.m. on Wednesday, May 24, 2017, or as soon thereafter as practicable. TransDigm respectfully requests that you notify John T. Owen of such effectiveness by a telephone call to (212) 326-7874.

Please contact John T. Owen of Jones Day at (212) 326-7874 if you have any questions concerning this matter. Thank you for your continued attention to this matter.

Very truly yours,

TRANSDIGM GROUP INCORPORATED

By: /s/ Terrance M. Paradie

Name: Terrance M. Paradie

Title: Executive Vice President and Chief  
Financial Officer

cc: John T. Owen, Esq.