



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

DIVISION OF  
CORPORATION FINANCE

March 2, 2011

Mr. William T. Hull  
Chief Financial Officer  
RTI International Metals, Inc.  
Westpointe Corporate Center One – 5<sup>th</sup> Floor  
1550 Coraopolis Heights Road  
Pittsburgh, PA 15108-2973

**Re: RTI International Metals, Inc.  
Form 10-K for the Fiscal Year Ended December 31, 2009  
Forms 10-Q for the Fiscal Quarters Ended March 31, 2010, June 30, 2010  
and September 30, 2010  
Form 8-K filed December 8, 2010  
File No. 001-14437**

Dear Mr. Hull:

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

Sincerely,

John Cash  
Accounting Branch Chief