

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

March 27, 2018

Jonathan Banas Chief Financial Officer Cooper-Standard Holdings Inc. 39550 Orchard Hill Place Drive Novi, Michigan 48375

> Re: Cooper-Standard Holdings Inc. Form 10-K for the Year Ended December 31, 2017 File No. 001-36127

Dear Mr. Banas:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Division of Corporation Finance Office of Transportation and Leisure