

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

July 26, 2017

Wayne Wilson Chief Financial Officer Malibu Boats, Inc. 5075 Kimberly Way Loudon, Tennessee 37774

Re: Malibu Boats, Inc.

Form 10-K for Fiscal Year Ended June 30, 2016

Filed September 9, 2016

File No. 001-36290

Dear Mr. Wilson:

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.

Sincerely,

/s/ Lyn Shenk

Lyn Shenk Branch Chief Office of Transportation and Leisure