



DIVISION OF
CORPORATION FINANCE

Mail Stop 3030

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

October 28, 2009

Richard Bowers
ASM International N.V.
3440 E. University Drive
Phoenix, Arizona 85034

**Re: ASM International N.V.
Form 20-F
Filed March 24, 2009
File No. 000-13355**

Dear Mr. Bowers:

We have completed our review of your Form 20-F and related filings and have no further comments at this time.

Sincerely,

Jay Mumford
Senior Attorney