

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

November 9, 2010

Mail Stop 4631

Mr. James J. Connor, CFO Tecumseh Products Company 1136 Oak Valley Drive Ann Arbor, MI 48108

Re: Tecumseh Products Company Form 10-K filed March 11, 2010 Form 10-Q filed August 5, 2010 File No. 0-00452

Dear Mr. Connor:

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

Sincerely,

Terence O'Brien, Branch Chief