

November 30, 2018

Patrick Dugan  
Chief Financial Officer  
Westinghouse Air Brake Technologies Corporation  
1001 Air Brake Avenue  
Wilmerding, PA 15148

Re: Westinghouse Air Brake Technologies Corporation  
Amendment No. 2 to  
Registration Statement on Form S-4  
Filed November 21, 2018  
File No. 333-227444

Dear Mr. Dugan:

We have reviewed your amended registration statement and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by amending your registration statement and providing the requested information. If you do not believe our comments apply to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your registration statement and the information you provide in response to these comments, we may have additional comments.

Form S-4

Material U.S. Federal Income Tax Consequences of the Distribution and the Merger to GE Stockholders, page 79

1. Please name tax counsel here and clarify to the extent that the discussion on page 80 under "The Distribution" and "The Merger" represents respective counsels' opinions. Also remove the implication in the carryover paragraph on pages 79-80 that GE stockholders are not entitled to rely on the tax opinions.

Exhibits

2. Prior to effectiveness, please file executed versions of exhibits 8.1 and 8.2.

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3. Refer to Exhibit 8.2. Please have counsel revise the second paragraph on page 2 to clarify that the discussion of material U.S. federal income tax consequences is counsel's opinion.

As currently drafted, counsel appears to opine on the manner in which the material tax consequences are described in the prospectus. For guidance, see section III.C.2 of Staff Legal Bulletin No. 19 (Oct. 14, 2011).

Please contact J. Nolan McWilliams at (202) 551-3217 or John Dana Brown at (202) 551-3859 with any questions you may have.

Sincerely,

FirstName LastNamePatrick Dugan

Division of Corporation

Finance

Comapany NameWestinghouse Air Brake Technologies Corporation

Office of Transportation

and Leisure

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cc: Peter E. Devlin, Esq.

FirstName LastName