





Management's Discussion and Analysis, page 28

2. We also note from the opening comments of your second quarter earnings release the "deceleration in global economic growth during the quarter." Please revise future filings to provide a more detailed discussion of the macroeconomic factors that have currently had a material adverse impact on your financial results, providing quantitative analysis where appropriate. Management's discussion and analysis should provide the reader with an understanding of the challenges currently facing the global steel industry, the impact on your operations, your strengths and vulnerabilities, and your expectations for potential future effects to your operations and liquidity, as seen through the eyes of management.

Our 2012 10-K risk factors include disclosure of the risks associated with worldwide overcapacity and excess supply in the steel industry, which have led to substantial price decreases in periods of economic recession, and the highly cyclical nature of steel consumption which generally follows economic and industrial conditions. In future filings, we will provide discussion within MD&A of macroeconomic factors, where appropriate, which have a material adverse effect on our financial results to the extent they are reasonably quantifiable.

As requested in your letter, U. S. Steel acknowledges that it is responsible for the adequacy and accuracy of its filings; that the Commission is not foreclosed from taking action as a result of staff comments or changes in disclosure as a result of staff comments; and that U. S. Steel may not assert staff comments as a defense in any proceeding initiated by the Commission or any other person under the federal securities law.

Please contact me (412-433-1166), or, in my absence, William King, Assistant Corporate Controller (412-433-5554) with any questions. With respect to any legal issues, please contact Robert Stanton, Assistant General Counsel (412-433-2877) or Jack Moran, Senior Counsel - Corporate (412-433-2890) directly.

Sincerely,

/s/ Gregory A. Zovko  
Gregory A. Zovko

cc: Gretchen R. Haggerty  
William C. King  
Robert M. Stanton  
Jack J. Moran