

Mail Stop 4631

August 31, 2015

<u>Via E-Mail</u> Mr. David B. Burritt Executive Vice President and Chief Financial Officer United States Steel Corporation 600 Grant Street Pittsburgh, PA 15219

> Re: United States Steel Corporation Form 10-K Filed February 24, 2015

by proiding the requested information, or by adisingus in you ill proide the requested response. If you do not believe our omments apply to your fats and irumstanes, please tell us jv in your response.

fer reieing the information you proide in response to these omments, womay here additional omments.

Form 10K for the year ended Dember 3, 2014

4. Exposed and other larges, pag F -17

1. We have read your response to comment 4 in our letter dated July 16, 2015. Please explain to us how you reasonably determined that the fair value of the USSC assets substantially exceeded carrying value at September 16, 2014, so that there would be enough cash available for you to recover the \$434 million. In this regard, please discuss the material assets that you concluded had fair values greater than carrying values at the CCAA filing date and provide us an analysis of the USSC asset with the largest excess of deemed fair value over carrying value along with your calculations and assumptions that support that conclusion. Tell us what specifically happened in the three months ended June 30, 2015 that indicated that your prior fair value estimates were not accurate.

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24. Contingencies and Commitments, page F-53

2. We have read your response to comment 5 in our letter dated July 16, 2015. So that we may understand your materiality assessment, please tell us the average settlement cost per claim for each period. Please disclose that the average settlement costs per claim were immaterial in each period.

You may contact Jenn Do at (202) 551-3743, Al Pavot at (202) 551-