





division of Dregization financi

Mail Stop 4631

August 31, 2015

Via E-Mail
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 **km** you **ill** proide th requested response. If you do not believ our omments apply to your fits and irumstanes, please tell us **l**y in your response.

fer reising the information you proide in response to these omments, way he additional omments.

Form 10K for the year ended Dember 3, 2014

4. Ponsolidation of U.S. Steel Canada and other heres, 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.

Mr. David B. Burritt United States Steel Corporation August 31, 2015 Page 2

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-