



CLEVELAND-CLIFFS INC.
200 Public Square, Suite 3300, Cleveland, OH 44114
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March 25, 2020

Correspondence Filing Via EDGAR

United States Securities and Exchange Commission
Division of Corporation Finance
100 F Street, N.E.
Washington, DC 20549

**Re: Cleveland-Cliffs
Inc.
Registration Statement on Form S-4 (Registration No. 333-237325)**

Ladies and Gentlemen:

On behalf of Cleveland-Cliffs Inc. ("**Cliffs**"), the undersigned hereby requests, pursuant to Rule 461(a) promulgated under the Securities Act of 1933, that the Registration Statement on Form S-4 (Registration No. 333-237325) of Cliffs and the subsidiary co-registrants named therein be declared effective at 9:00 a.m. on Friday, March 27, 2020, or as soon thereafter as practicable. Cliffs respectfully requests that you notify Michael J. Solecki of such effectiveness by a telephone call to (216) 586-7103.

Very truly yours,

CLEVELAND-CLIFFS INC.

By: /s/ James D. Graham

Name: James D. Graham

Title: Executive Vice President, Chief Legal
Officer & Secretary

cc: Michael J. Solecki, Esq. (Jones
Day)

[Signature Page to Request for Acceleration of Effectiveness]