

December 4, 2009

U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Mail Stop 4631  
Washington, D.C. 20549

Attention: Mr. Terence O'Brien, Accounting Branch Chief  
Division of Corporation Finance

CC: Ms. Tracey Houser, Staff Accountant  
Division of Corporation Finance

Mr. Edward M. Kelly, Senior Counsel  
Division of Corporation Finance

Ms. Pamela A. Long, Associate Director  
Division of Corporation Finance

**RE: CompX International Inc.  
Form 10-K for the Fiscal Year Ended December 31, 2008, Filed February 26, 2009  
Forms 10-Q for the Fiscal Quarters Ended March 31, 2009, June 30, 2009 and  
September 30, 2009  
File No. 1-13905**

Dear Mr. O'Brien

Reference is made to the Staff's letter dated November 25, 2009, (the "Comment Letter"), which sets forth comments of the Staff regarding the above referenced Form 10-K and Forms 10-Q of CompX International Inc. ("CompX"). CompX has responded to the Comment Letter as follows. The responses are numbered to correspond to the numbers of the Comment Letter.

**Form 10-K for the Fiscal Year Ended December 31, 2008**

**Exhibits 10.1 and 10.10**

1. We reviewed the response to the prior comment 12 and are unable to concur. As noted previously, there is no provision in Item 601(b)(10) of Regulation S-K for excluding schedules or similar attachments. While we note that your exhibit list states that you will furnish schedules and attachments upon request for each of these exhibits, please be aware that this provision only applies to exhibits filed under Item 601(b)(2) of Regulation S-K (plans of acquisition, reorganizations, etc.), and not to material contracts filed under Item 601(b)(10). Further, Rule 12b-31, which you cite in your response, relates to the omission of substantially identical documents and requires the filing of a schedule identifying the other documents omitted and setting forth the material details in which the documents differ from the document of which a copy is filed. It does not pertain to the exclusion of schedules and attachments to documents filed as exhibits. Please refile the captioned exhibits, with all schedules and exhibits attached, in your next Exchange Act filing.

In our Annual Report on Form 10-K for the year ending December 31, 2009, we will refile the captioned exhibits indicated above and include all schedules, exhibits, annexes or similar attachments to the documents as part of such filing.

If you have any questions regarding our responses to the Comment Letter, please feel free to call me at (972) 448-1413. I can also be reached via facsimile at (972) 448-1408 or via email at dhalbert@compX.com.

Sincerely,

CompX International Inc.

By: /s/ Darryl R. Halbert  
Darryl R. Halbert,  
Vice President, Chief Financial Officer  
and Controller

