Deputy General Counsel and Secretary DUCOMMUN INC /DE/ 200 Sandpointe Avenue Suite 700 Santa Ana, CA 92707 Re: DUCOMMUN INC /DE/ Registration Statement on Form S-3 Filed November 21, 2019 File No. 333-234808 Dear Mr. Tata: This is to advise you that we have not reviewed and will not review your registration statement. Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff. Please contact Erin Purnell at 202-551-3454 with any questions.

> Sincerely, Division of

Corporation Finance

Manufacturing

Rajiv Tata

Office of