



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-7010

October 9, 2009

Via U.S. Mail and Facsimile (770-813-6158)

Martin Richenhagen
Chairman, President and Chief Executive Officer
Agco Corporation
4205 River Green Parkway
Duluth, GA 30096

Re: Agco Corporation
Form 10-K for the Fiscal Year Ended December 31, 2008
Filed February 27, 2009
File No. 1-12930
Response Letter Filed September 17, 2009

Dear Mr. Richenhagen:

We refer you to our comment letter dated August 26, 2009 regarding business contacts with Iran, Syria and Sudan. We have completed our review of this subject matter and have no further comments at this time.

Sincerely,

Cecilia Blye, Chief
Office of Global Security Risk

cc: Peggy Fisher
Assistant Director
Division of Corporation Finance