



March 20, 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
Filed March 20, 2020**

Ladies and Gentlemen:

On the date hereof, Cleveland-Cliffs Inc., an Ohio corporation (the "Company"), and AH Management, Inc., AKS Investments, Inc., AK Steel Corporation, AK Steel Holding Corporation, AK Steel Properties, Inc., AK Tube LLC, Cliffs Mining Company, Cliffs Minnesota Mining Company, Cliffs TIOP Holding, LLC, Cliffs TIOP, Inc., Cliffs TIOP II, LLC, Cliffs UTAC Holding LLC, IronUnits LLC, Lake Superior & Ishpeming Railroad Company, Mountain State Carbon, LLC, Northshore Mining Company, PPHC Holdings, LLC, Silver Bay Power Company, SNA Carbon, LLC, The Cleveland-Cliffs Iron Company, Tilden Mining Company, Tilden Board State and Fire LLC (collectively, the "Guarantors" and, together with the Company, the "Registrants") filed with the Securities and Exchange Commission (the "

pro



CLIFFS TIOP HOLDING, LLC
CLIFFS TIOP II, LLC

By: /s/ James D. Graham
Name: James D. Graham
Title: General Counsel and Secretary

THE CLEVELAND-CLIFFS IRON COMPANY
TILDEN MINING COMPANY L.C.

By: The Cleveland-Cliffs Iron Company, as its
manager

By: /s/ James D. Graham
Name: James D. Graham
Title: Executive Vice President, Chief Legal
Officer & Secretary

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