

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

DIVISION OF CORPORATION FINANCE

December 15, 2017

Frederick J. Sohm Chief Financial Officer Spartan Motors, Inc. 1541 Reynolds Road Charlotte, Michigan 48813

> Re: Spartan Motors, Inc. Form 10-K for Fiscal Year Ended December 31, 2016 Filed March 3, 2017 Form 10-Q for Quarterly Period Ended September 30, 2017 Filed November 1, 2017 Form 8-K Furnished November 1, 2017 File No. 001-33582

Dear Mr. Sohm:

We have completed our review of your filings. 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.

Sincerely,

/s/ Lyn Shenk

Lyn Shenk Branch Chief Office of Transportation and Leisure