

Mail Stop 6010

February 28, 2006

David B. Downing
Vice President and Chief Financial Officer
Lindsay Manufacturing Company
2707 North 108th Street, Suite 102
Omaha, Nebraska 68164

RE: Lindsay Manufacturing Company
Form 10-K for the fiscal year ended August 31, 2005
Filed November 14, 2005
File No. 1-13419

Dear Mr. Downing:

We have reviewed your filing and have the following comments. We have limited our review of your filing to those issues we have addressed in our comments. Where indicated, we think you should revise your document in future filings in response to these comments. If you disagree, we will consider your explanation as to why our comment is inapplicable or a revision is unnecessary. Please be as detailed as necessary in your explanation. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure. After reviewing this information, we may raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comments or on any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

Form 10-K for the period ending August 31, 2005

Management Discussion and Analysis, page 12

Critical Accounting Policies, page 12

1. We see your critical accounting policy regarding revenue recognition. However, the disclosure merely repeats the policies from your significant accounting policies footnote without elaboration. Please expand in future filings to describe the specific factors that in your view make it critical. Discuss the nature of estimates and uncertainties about those estimates inherent to your revenue recognition policy, including how you make those estimates. Discuss how different assumptions, methods or conditions might effect your financial statements.

Notes to Consolidated Financial Statements, page 25

Note M. Commitments and Contingencies, page 35

2. We note that you entered into a consent decree with the U.S. Environmental Protection Agency concerning groundwater contamination at your Lindsay, Nebraska facility. Please tell us, and in future filings provide more details of the terms of the consent decree that you entered into with the EPA and why this will not materially impact your results. Please note that, under SAB Topic 5-Y, a statement that the contingency is not expected to be material does not satisfy the requirements of SFAS 5 if there is at least a reasonable possibility that a loss may have been incurred and the amount of that loss would be material to a decision to buy or sell the company's securities. Please advise us why you do not believe that additional disclosures should be provided in the footnotes to the financial statements or in MD&A.

Note R. Quarterly Results of Operations, page 41

3. We note significant fourth-quarter LIFO inventory adjustments and physical inventory adjustments that affected earnings in 2005 and 2004. Please tell us, and disclose in future filings, the facts and circumstances of these charges. Your disclosure should explain why the fourth quarters of 2005 and 2004 were the proper periods to record the charges and why these adjustments should not be recorded in prior periods.

4. In this regard, tell us more about the reserve for obsolete or slow moving inventory. Tell us your method of measuring inventory obsolescence. Explain if your policy is the same for all inventory items and categories. Confirm that all items are completely written-off. For any items retained, tell us what consideration have you given to the fact that subsequent sales of these items could

materially impact future gross profit margins. With respect to these valuation allowances, confirm that inventory impairment charges establish a new cost basis for inventory and that charges are not subsequently reversed to income even if circumstances later suggest that increased carrying amounts are recoverable. Refer to SAB Topic 5-BB.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that they have provided all information investors require. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In connection with responding to our comments, please provide, in writing, a statement from the company acknowledging that

- * the company is responsible for the adequacy and accuracy of the disclosure in the filings;
- * staff comments or changes to disclosure in response to staff comments in the filings reviewed by the staff do not foreclose the Commission from taking any action with respect to the filing; and
- * the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filing or in response to our comments on your filing.

As appropriate, please respond to these comments within 10 business days or tell us when you will provide us with a response. Please furnish a cover letter with your response that keys your responses to our comments and provides any requested information. Detailed cover letters greatly facilitate our review. Please file your cover letter on EDGAR. Please understand that we may have additional comments after reviewing your responses to our comments.

You may contact Dennis Hult, Staff Accountant, at (202) 551-3618 or me at (202) 551-3554 if you have questions regarding comments on the financial statements and

related matters. In this regard, do not hesitate to contact Martin.

James, Senior Assistant Chief Accountant, at (202) 551-3671.

Sincerely,

Angela J. Crane
Accounting Branch Chief