ESCO Technologies Inc. 9900A Clayton Road St. Louis, Mo 63124-1186 314-213-7246 Ph 314-213-7250 Fax www.escotechnologies.com

February 6, 2006

Mr. Joseph A. Foti Senior Assistant Chief Accountant Securities and Exchange Commission Washington, D.C. 20549

Re: ESCO Technologies Inc.(the Company)
Form 10-K Annual Report
For the Fiscal Year Ended September 30, 2005
Filed December 14, 2005
Commission File No. 1-10596

Dear Mr. Foti:

ESCO Technologies Inc. (the "Company") hereby acknowledges receipt of your letter dated February 2, 2006 regarding the Company's Form 10-K Annual Report for the fiscal year ended September 30, 2005.

In response to your letter, the Company is preparing a written response supporting its accounting treatment and related disclosures. In order for us to develop and prepare the relevant information, we are requesting an additional 10 business days to complete our response and propose to submit our response on or before March 2, 2006. As additional support for our request for more time, we note that individuals involved in preparing our response are currently working on integrating two recent acquisitions, the most recent of which we closed on February, 1, 2006, the closing of the first fiscal quarter and preparing the related and required accounting documents. We appreciate your understanding in this matter.

Please acknowledge agreement to our request to respond by March 2, 2006 by notification to the undersigned via fax (314-213-7250) or e-mail(muenster@escotechnologies.com).

Very truly yours,

Gary E. Muenster Senior Vice President and Chief Financial Officer

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