SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549

SCHEDULE 13D

Under the Securities Exchange Act of 1934

Dana Holding Corporation (Name of Issuer)

Common Stock (Title of Class of Securities)

235825205 (CUSIP Number)

David Goldman GAMCO Investors, Inc. One Corporate Center Rye, New York 10580-1435 (914) 921-5000

(Name, Address and Telephone Number of Person Authorized to Receive Notices and Communications)

October 27, 2015

(Date of Event which Requires Filing of this Statement)

If the filing person has previously filed a statement on Schedule 13G to report the acquisition that is the subject of this Schedule 13D, and is filing this schedule because of §§ 240.13d-1(e), 240.13d-1(f) or 240.13d-1(g), check the following box .

Gabelli Funds, LLC Check the appropriate box	x if a member of a group (S	FE INSTRUCTIONS)		
		LE INSTRUCTIONS)	(a)	
		(b)		
Sec use only				
Check box if disclosure of	legal proceedings is require	ed pursuant to items 2 (d) or 2 (e)		
Citizenship or place of org New York	ganization			
Number Of	: 7	Sole voting power		
Shares	:	2,493,700 (Item 5)		
Beneficially	: 8	Shared voting power		
Owned	: :	None		
By Each	<u>:</u> : 9	Sole dispositive power		
Reporting	: :	2,493,700 (Item 5)		
Person	<u>:</u> :10	Shared dispositive power		
With	: :	None		
Aggregate amount beneficially owned by each reporting person				
2,493,700 (Item 5)				
Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS)				
Percent of class represente	ed by amount in row (11)			
1.63%				
Type of reporting person (IA, CO	(SEE INSTRUCTIONS)			
	Source of funds (SEE INS 00-Funds of investment of the control of	Source of funds (SEE INSTRUCTIONS) 00-Funds of investment advisory clients Check box if disclosure of legal proceedings is required. Citizenship or place of organization New York Number Of : 7 : Shares :: Beneficially : 8 : Owned :: By Each : 9 : Reporting :: Person ::10 With :: Aggregate amount beneficially owned by each reporting 2,493,700 (Item 5) Check box if the aggregate amount in row (11) exclude (SEE INSTRUCTIONS) Percent of class represented by amount in row (11) 1.63%	Sec use only Source of funds (SEE INSTRUCTIONS) 00-Funds of investment advisory clients Check box if disclosure of legal proceedings is required pursuant to items 2 (d) or 2 (e) Citizenship or place of organization New York Number Of : 7 Sole voting power : 2,493,700 (Item 5) : Beneficially : 8 Shared voting power : Owned : None : None : 9 Sole dispositive power : 2,493,700 (Item 5) : Person : 10 Shared dispositive power With : None Aggregate amount beneficially owned by each reporting person 2,493,700 (Item 5) Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) Type of reporting person (SEE INSTRUCTIONS)	

Names of reporting persons

2 Check the appropriate box if a member of a group (SEE INSTRUCTIONS) (b) 3 Sec use only 4 Source of funds (SEE INSTRUCTIONS) 00-Funds of investment advisory clients 5 Check box if disclosure of legal proceedings is required pursuant to items 2 (d) or 2 (e) 6 Citizenship or place of organization New York Number Of :7 Sole voting power Shares : 4,936,224 (Item 5) Beneficially :8 Shared voting power Owned : None By Each :9 Sole dispositive power Reporting : 5,149,724 (Item 5) Person :10 Shared dispositive power With : None 11 Aggregate amount beneficially owned by each reporting person 5,149,724 (Item 5) 12 Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) 13 Percent of class represented by amount in row (11) 3,37%	1	Names of reporting persons I.R.S. identification nos. of above persons (entities only) GAMCO Asset Management Inc. I.D. No. 13-4044521				
3 Sec use only 4 Source of funds (SEE INSTRUCTIONS) 00-Funds of investment advisory clients 5 Check box if disclosure of legal proceedings is required pursuant to items 2 (d) or 2 (e) 6 Citizenship or place of organization New York Number Of: 7 Sole voting power Shares: 4,936,224 (Item 5) Beneficially: 8 Shared voting power Owned: None By Each: 9 Sole dispositive power Reporting: 5,149,724 (Item 5) Person: 10 Shared dispositive power With: None 11 Aggregate amount beneficially owned by each reporting person 5,149,724 (Item 5) 12 Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS)	2					
3 Sec use only 4 Source of funds (SEE INSTRUCTIONS) 00-Funds of investment advisory clients 5 Check box if disclosure of legal proceedings is required pursuant to items 2 (d) or 2 (e) 6 Citizenship or place of organization New York Number Of : 7 Sole voting power :				4)		
4 Source of funds (SEE INSTRUCTIONS) 00-Funds of investment advisory clients 5 Check box if disclosure of legal proceedings is required pursuant to items 2 (d) or 2 (e) 6 Citizenship or place of organization New York Number Of : 7 Sole voting power : 4,936,224 (Item 5) Beneficially : 8 Shared voting power Owned : None By Each : 9 Sole dispositive power Reporting : 5,149,724 (Item 5) Person : 10 Shared dispositive power With : None 11 Aggregate amount beneficially owned by each reporting person 5,149,724 (Item 5) 12 Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS)				(b)		
00-Funds of investment advisory clients 5	3	Sec use only				
6 Citizenship or place of organization New York Number Of : 7 Sole voting power : 4,936,224 (Item 5) : 8 Shares : 4,936,224 (Item 5) : 0wned : None : None : 9 Sole dispositive power Reporting : 5,149,724 (Item 5) : Person : 10 Shared dispositive power With : None : None : 11 Aggregate amount beneficially owned by each reporting person 5,149,724 (Item 5) : Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS)	4					
New York Number Of	5	Check box if disclosure of	f legal proceedings is requi	red pursuant to items 2 (d) or 2 (e)		
Shares : 4,936,224 (Item 5) Beneficially : 8 Shared voting power Owned : None By Each : 9 Sole dispositive power Reporting : 5,149,724 (Item 5) Person : 10 Shared dispositive power With : None 11 Aggregate amount beneficially owned by each reporting person 5,149,724 (Item 5) 12 Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) 13 Percent of class represented by amount in row (11) 3.37%	6		ganization			
Beneficially :8 Shared voting power Owned : None By Each :9 Sole dispositive power Reporting : 5,149,724 (Item 5) Person :10 Shared dispositive power With : None 11 Aggregate amount beneficially owned by each reporting person 5,149,724 (Item 5) 12 Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) 13 Percent of class represented by amount in row (11) 3.37%		Number Of	: 7	Sole voting power		
Owned By Each Person Ito Shared dispositive power With Aggregate amount beneficially owned by each reporting person 5,149,724 (Item 5) Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) Percent of class represented by amount in row (11) 3.37% Type of reporting person (SEE INSTRUCTIONS)		Shares	:	4,936,224 (Item 5)		
By Each : 9 Sole dispositive power Reporting : 5,149,724 (Item 5) Person : 10 Shared dispositive power With : None : 11 Aggregate amount beneficially owned by each reporting person 5,149,724 (Item 5) 12 Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) 13 Percent of class represented by amount in row (11) 3,37%		Beneficially	: 8	Shared voting power		
Reporting Person With Aggregate amount beneficially owned by each reporting person 5,149,724 (Item 5) Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) Percent of class represented by amount in row (11) 3,37% Type of reporting person (SEE INSTRUCTIONS)		Owned	: :	None		
Person With Aggregate amount beneficially owned by each reporting person 5,149,724 (Item 5) Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) Percent of class represented by amount in row (11) 3.37%		By Each	<u>:</u> : 9	Sole dispositive power		
With : None : None : 10 Shared dispositive power : None : 11 Aggregate amount beneficially owned by each reporting person 5,149,724 (Item 5) 12 Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) 13 Percent of class represented by amount in row (11) 3.37%		Reporting	: :	5,149,724 (Item 5)		
i : None i: 10 Aggregate amount beneficially owned by each reporting person 5,149,724 (Item 5) 12 Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) 13 Percent of class represented by amount in row (11) 3.37%		Person	: :10	Shared dispositive power		
5,149,724 (Item 5) Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) Percent of class represented by amount in row (11) 3.37% Type of reporting person (SEE INSTRUCTIONS)		With	: : :	None		
Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) Percent of class represented by amount in row (11) 3.37% Type of reporting person (SEE INSTRUCTIONS)	11	Aggregate amount beneficially owned by each reporting person				
(SEE INSTRUCTIONS) 13 Percent of class represented by amount in row (11) 3.37% 14 Type of reporting person (SEE INSTRUCTIONS)		5,149,724 (Item 5)				
3.37% Type of reporting person (SEE INSTRUCTIONS)	12					
14 Type of reporting person (SEE INSTRUCTIONS)	13	Percent of class represent	ed by amount in row (11)			
		3.37%				
	14		(SEE INSTRUCTIONS)			

1	Names of reporting persons I.R.S. identification nos. of above persons (entities only)				
2	Teton Advisors, Inc. I.D. No. 13-4008049 Check the appropriate box if a member of a group (SEE INSTRUCTIONS)				
_	Check the appropriate be	ox it a member of a group (SEE INSTRUCTIONS)	(a)	
			(h)		
			(b)		
3	Sec use only				
4	Source of funds (SEE INS				
	00 – Funds of investment	advisory client.			
5	Check box if disclosure of	f legal proceedings is requi	red pursuant to items 2 (d) or 2 (e)		
			•		
6	Citizenship or place of or	ganization			
v	Delaware	guinzution			
	Number Of	: 7	Sole voting power		
	Shares	:	105,000 (Item 5)		
		: :	103,000 (Itchi 3)		
	Beneficially	: 8	Shared voting power		
	Owned	:	None		
	By Each	<u>:</u> : 9	Sole dispositive power		
	December	:			
	Reporting	:	105,000 (Item 5)		
	Person	:10	Shared dispositive power		
	With	: •	None		
		:			
11	Aggregate amount beneficially owned by each reporting person				
	105,000 (Item 5)				
12	Check hoy if the aggregat	te amount in row (11) exclu	ndes certain shares		
	(SEE INSTRUCTIONS)	te unioune in 10w (11) excit	aces certain shares		
13 Percent of class represented by amou		ted by amount in row (11)			
	0.07%				
14	Type of reporting person (SEE INSTRUCTIONS) IA, CO				
	in, co				
			4		

1	Names of reporting persons I.R.S. identification nos. of above persons (entities only) Gabelli Securities, Inc. I.D. No. 13-3379374			
2	Gabelli Securities, Inc. Check the appropriate bo		p (SEE INSTRUCTIONS)	(a)
			(b)	
3	Sec use only			
4	Source of funds (SEE INSTRUCTIONS) 00 – Client funds			
5	Check box if disclosure of	legal proceedings is req	uired pursuant to items 2 (d) or 2 (e)	
6	Citizenship or place of org Delaware	ganization		
	Number Of	: 7	Sole voting power	
	Shares	: :	6,500 (Item 5)	
	Beneficially	: 8	Shared voting power	
	Owned	:	None	
	By Each	: : 9	Sole dispositive power	
	Reporting	: :	6,500 (Item 5)	
	Person	: :10	Shared dispositive power	
	With	: :	None	
11	Aggregate amount benefic	cially owned by each rep	porting person	
	6,500 (Item 5)			
12	Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS)			
13	Percent of class represent	ed by amount in row (11		
	0.00%			
14	Type of reporting person (HC, CO, IA	(SEE INSTRUCTIONS		
			5	

CUSIP	No. 235825205					
1	Names of reporting persons					
		I.R.S. identification nos. of above persons (entities only)				
	GGCP, Inc.		I.D. No. 13-3056041			
2	Check the appropriate bo	x if a member of a group ((SEE INSTRUCTIONS)	(a)		
			4.)			
			(b)			
	Canada andra					
3	Sec use only					
4	Source of funds (SEE INS	TDUCTIONS)				
4	WC	TRUCTIONS)				

5	Check box if disclosure of	legal proceedings is requi	red pursuant to items 2 (d) or 2 (e)			
6	Citizenship or place of org	ganization				
	Wyoming					
	Number Of	: 7	Sole voting power			
	Cl · · ·	:	No. of Change			
	Shares	; •	None (Item 5)			
	Beneficially	<u>:</u> : 8	Shared voting power			
	Denenciary	• 0	Shared voting power			
	Owned	· :	None			
		:				
	By Each	: 9	Sole dispositive power			
		:	• •			
	Reporting	:	None (Item 5)			
	Person	:				
	Ferson	:10	Shared dispositive power			
	With	:	No.			
		; •	None			
11	: Aggregate amount beneficially owned by each reporting person					
	Aggregate amount beneficially owned by each reporting person					
	None (Item 5)					
	Check box if the aggregat		ıdes certain shares			
12	(SEE INSTRUCTIONS) X					
13	Percent of class represent	Percent of class represented by amount in row (11)				
	0.00%					
	TD ((OFF INCEDALGERONS)				
14	Type of reporting person (SEE INSTRUCTIONS)					
	HC, CO					

CUSIP No. 235825205 Names of reporting persons I.R.S. identification nos. of above persons (entities only) **GAMCO** Investors, Inc. I.D. No. 13-4007862 Check the appropriate box if a member of a group (SEE INSTRUCTIONS) (a) **(b)** Sec use only Source of funds (SEE INSTRUCTIONS) Check box if disclosure of legal proceedings is required pursuant to items 2 (d) or 2 (e) Citizenship or place of organization **Delaware** : 7 **Number Of** Sole voting power : **Shares** : 4,150 (Item 5) Beneficially : 8 **Shared voting power** : Owned None By Each Sole dispositive power : 9 Reporting 4,150 (Item 5) Person :10 Shared dispositive power With None 11 Aggregate amount beneficially owned by each reporting person **4,150** (Item 5) Check box if the aggregate amount in row (11) excludes certain shares 12 (SEE INSTRUCTIONS) X 13 Percent of class represented by amount in row (11) 0.00% 14 Type of reporting person (SEE INSTRUCTIONS)

HC, CO

1	Names of reporting persons I.R.S. identification nos. of above persons (entities only) Mario J. Gabelli					
2	Check the appropriate bo	x if a member of a group	(SEE INSTRUCTIONS)	(a)		
			(b)			
3	Sec use only					
4	Source of funds (SEE INS	STRUCTIONS)				
	Private Funds					
5	Check box if disclosure of	legal proceedings is requ	ired pursuant to items 2 (d) or 2 (e)			
						
6	Citizenship or place of org USA	ganization				
	Number Of	: 7	Sole voting power			
	Shares	:	98,500 (Item 5)			
	Beneficially	: 8	Shared voting power			
	Owned	: :	None			
	By Each	<u>:</u> : 9	Sole dispositive power			
	Reporting	: :	98,500 (Item 5)			
	Person	: :10	Shared dispositive power			
	With	: :	None			
11	Aggregate amount benefic	: cially owned by each repo	rting person			
	98,500 (Item 5)					
12	Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) X					
12	Decreed of alone warmeness	- J b., (11)				
13	Percent of class represented by amount in row (11)					
	0.06%					
14	Type of reporting person IN	(SEE INSTRUCTIONS)				
			8			

Item 1. <u>Security and Issuer</u>

The class of equity securities to which this statement on Schedule 13D relates is the Common Stock of Dana Holding Corporation (the "Issuer"), a Delaware corporation with principal offices located at 3939 Technology Drive, Maumee, Ohio 43537.

Item 2. <u>Identity and Background</u>

This statement is being filed by Mario J. Gabelli ("Mario Gabelli") and various entities which he

directly or indirectly controls or for which he acts as chief investment officer. These entities, except for LICT Corporation ("LICT), CIBL, Inc. ("CIBL") and ICTC Group, Inc. ("ICTC"), engage in various aspects of the securities business, primarily as investment adviser to various institutional and individual clients, including registered investment companies and pension plans, and as general partner or the equivalent of various private investment partnerships or private funds. Certain of these entities may also make investments for their own accounts.

The foregoing persons in the aggregate often own beneficially more than 5% of a class of equity securities of a particular issuer. Although several of the foregoing persons are treated as institutional investors for purposes of reporting their beneficial ownership on the short-form Schedule 13G, the holdings of those who do not qualify as institutional investors may exceed the 1% threshold presented for filing on Schedule 13G or implementation of their investment philosophy may from time to time require action which could be viewed as not completely passive. In order to avoid any question as to whether their beneficial ownership is being reported on the proper form and in order to provide greater investment flexibility and administrative uniformity, these persons have decided to file their beneficial ownership reports on the more detailed Schedule 13D form rather than on the short-form Schedule 13G and thereby to provide more expansive disclosure than may be necessary.

(a), (b) and (c) - This statement is being filed by one or more of the following persons: GGCP, Inc. ("GGCP"), GGCP Holdings LLC ("GGCP Holdings"), GAMCO Investors, Inc. ("GBL"), Gabelli Funds, LLC ("Gabelli Funds"), GAMCO Asset Management Inc. ("GAMCO"), Teton Advisors, Inc. ("Teton Advisors"), Gabelli Securities, Inc. ("GSI"), G.research, LLC ("G.research"), MJG Associates, Inc. ("MJG Associates"), Gabelli Foundation, Inc. ("Foundation"), MJG-IV Limited Partnership ("MJG-IV"), Mario Gabelli, LICT, CIBL and ICTC. Those of the foregoing persons signing this Schedule 13D are hereinafter referred to as the "Reporting Persons".

GGCP makes investments for its own account and is the manager and a member of GGCP Holdings which is the controlling shareholder of GBL. GBL, a public company listed on the New York Stock Exchange, is the parent company for a variety of companies engaged in the securities business, including those named below.

GAMCO, a wholly-owned subsidiary of GBL, is an investment adviser registered under the Investment Advisers Act of 1940, as amended ("Advisers Act"). GAMCO is an investment manager providing discretionary managed account services for employee benefit plans, private investors, endowments, foundations and others.

GSI, a majority-owned subsidiary of GBL, is an investment adviser registered under the Advisers Act and serves as a general partner or investment manager to limited partnerships and offshore investment companies and other accounts. As a part of its business, GSI may purchase or sell securities for its own account. GSI is a general partner or investment manager of a number of funds or partnerships, including Gabelli Associates Fund, L.P., Gabelli Associates Fund II, L.P., Gabelli Associates Limited, Gabelli Associates Limited II E, ALCE Partners, L.P., Gabelli Capital Structure Arbitrage Fund L.P., Gabelli Capital Structure Arbitrage Fund L.P., Gabelli Intermediate Credit Fund L.P., Gabelli Japanese Value Partners L.P., GAMA Select Energy + L.P., GAMCO Medical Opportunities L.P., GAMCO Long/Short Equity Fund, L.P., Gabelli Multimedia Partners, L.P., Gabelli International Gold Fund Limited and Gabelli Green Long/Short Fund, L.P.

G.research, a wholly-owned subsidiary of GSI, is a broker-dealer registered under the Securities Exchange Act of 1934, as amended ("1934 Act"), which as a part of its business regularly purchases and sells securities for its own account.

Gabelli Funds, a wholly owned subsidiary of GBL, is a limited liability company. Gabelli Funds is an investment adviser registered under the Advisers Act which provides advisory services for The Gabelli Equity Trust Inc., The Gabelli Asset Fund, The GAMCO Growth Fund, The Gabelli Convertible and Income Securities Fund Inc., The Gabelli Value 25 Fund Inc., The Gabelli Small Cap Growth Fund, The Gabelli Equity Income Fund, The Gabelli ABC Fund, The GAMCO Global Telecommunications Fund, The Gabelli Gold Fund, Inc., The Gabelli Multimedia Trust Inc., The Gabelli Global Rising Income & Dividend Fund, The Gabelli Capital Asset Fund, The GAMCO International Growth Fund, Inc., The GAMCO Global Growth Fund, The Gabelli Utility Trust, The GAMCO Global Opportunity Fund, The Gabelli Utilities Fund, The Gabelli Dividend Growth Fund, The GAMCO Mathers Fund, The Gabelli Focus Five Fund, The Comstock Capital Value Fund, The Gabelli Dividend and Income Trust, The Gabelli Global Utility & Income Trust, The GAMCO Global Gold, Natural Resources, & Income Trust, The GAMCO Natural Resources Gold & Income Trust, The GDL Fund, Gabelli Enterprise Mergers & Acquisitions Fund, The Gabelli SRI Fund, Inc., The Gabelli Healthcare & Wellness Rx Trust, The Gabelli Global Small and Mid Cap Value Trust and Gabelli Value Plus+ Trust (collectively, the "Funds"), which are registered investment companies. Gabelli Funds is also the investment adviser to The GAMCO International SICAV (sub-funds GAMCO Merger Arbitrage and GAMCO All Cap Value), a UCITS III vehicle.

Teton Advisors, an investment adviser registered under the Advisers Act, provides discretionary advisory services to The TETON Westwood Mighty Mitessm Fund, The TETON Westwood Income Fund, The TETON Westwood SmallCap Equity Fund, and The TETON Westwood Mid-Cap Equity Fund.

MJG Associates provides advisory services to private investment partnerships and offshore funds. Mario Gabelli is the sole shareholder, director and employee of MJG Associates. MJG Associates is the Investment Manager of Gabelli International Limited and Gabelli Fund, LDC. Mario J. Gabelli is the general partner of Gabelli Performance Partnership, LP.

The Foundation is a private foundation. Mario Gabelli is the Chairman, a Trustee and the Investment Manager of the Foundation. Elisa M. Wilson is the President of the Foundation.

LICT is a holding company with operating subsidiaries engaged primarily in the rural telephone industry. LICT actively pursues new business ventures and acquisitions. LICT makes investments in marketable securities to preserve capital and maintain liquidity for financing their business activities and acquisitions and are not engaged in the business of investing, or trading in securities. Mario J. Gabelli is a director, and substantial shareholder of LICT.

ICTC is a holding company with subsidiaries in voice, broadband and other telecommunications services, primarily in the rural telephone industry. ICTC makes investments in marketable securities to preserve capital and maintain liquidity for financing their business activities and acquisitions and are not engaged in the business of investing, or trading in securities. Mario J. Gabelli is a director, and substantial shareholder of ICTC.

CIBL is a holding company with interests in telecommunications operations, primarily in the rural telephone industry. CIBL actively pursues new business ventures and acquisitions. CIBL makes investments in marketable securities to preserve capital and maintain liquidity for financing their business activities and acquisitions and are not engaged in the business of investing, or trading in securities. Mario J. Gabelli is a director, and substantial shareholder of CIBL.

Mario Gabelli is the controlling stockholder, Chief Executive Officer and a director of GGCP and Chairman and Chief Executive Officer of GBL. Mario Gabelli is also a member of GGCP Holdings. Mario Gabelli is the controlling shareholder of Teton.

MJG-IV is a family partnership in which Mario Gabelli is the general partner. Mario Gabelli has less than a 100% interest in MJG-IV. MJG-IV makes investments for its own account. Mario Gabelli disclaims ownership of the securities held by MJG-IV beyond his pecuniary interest.

The Reporting Persons do not admit that they constitute a group.

GAMCO and G.research are New York corporations and GBL, GSI, and Teton Advisors are Delaware corporations, each having its principal business office at One Corporate Center, Rye, New York 10580. GGCP is a Wyoming corporation having its principal business office at 140 Greenwich Avenue, Greenwich, CT 06830. GGCP Holdings is a Delaware limited liability corporation having its principal business office at 140 Greenwich Avenue, Greenwich, CT 06830. Gabelli Funds is a New York limited liability company having its principal business office at One Corporate Center, Rye,

New York 10580. MJG Associates is a Connecticut corporation having its principal business office at 140 Greenwich Avenue, Greenwich, CT 06830. The Foundation is a Nevada corporation having its principal offices at 165 West Liberty Street, Reno, Nevada 89501. LICT is a Delaware corporation having its principal place of business as 401 Theodore Fremd Avenue, Rye, New York 10580. CIBL, Inc. is a Delaware corporation having its principal place of business as 165 West Liberty Street, Suite 220, Reno, NV 89501. ICTC Group Inc. is a Delaware corporation having its principal place of business as 556 Main Street, Nome, North Dakota 58062.

For information required by instruction C to Schedule 13D with respect to the executive officers and directors of the foregoing entities and other related persons (collectively, "Covered Persons"), reference is made to Schedule I annexed hereto and incorporated herein by reference.

- (d) Not applicable.
- (e) Not applicable.
- (f) Reference is made to Schedule I hereto.

Item 3. Source and Amount of Funds or Other Consideration

The Reporting Persons used an aggregate of approximately \$109,421,765 to purchase the Securities reported as beneficially owned in Item 5. GAMCO and Gabelli Funds used approximately \$78,824,792 and \$27,920,011, respectively, of funds that were provided through the accounts of certain of their investment advisory clients (and, in the case of some of such accounts at GAMCO, may be through borrowings from client margin accounts) in order to purchase the Securities for such clients. GSI used approximately \$83,410 of client funds to purchase the Securities reported by it. Mario Gabelli used approximately \$1,739,162 of private funds to purchase the Securities reported by him. GBL used approximately \$89,491 of working capital to purchase the Securities reported by it. Teton Advisors used approximately \$764,899 of funds of investment advisory clients to purchase the Securities reported by it.

Item 4. **Purpose of Transaction**

Each of the Reporting Persons has purchased and holds the Securities reported by it for investment for one or more accounts over which it has shared, sole, or both investment and/or voting power, for its own account, or both.

The Reporting Persons are engaged in the business of securities analysis and investment. The Reporting Persons analyze the operations, capital structure and markets of companies in which they invest, including the Issuer, on a continuous basis through analysis of documentation and discussions with knowledgeable industry and market observers and with representatives of such companies (often at the invitation of management). As a result of these analytical activities one or more of the Reporting Persons may issue analysts reports, participate in interviews or hold discussions with third parties, with management or with Directors in which the Reporting Person may suggest or take a position with respect to potential changes in the operations, management or capital structure of such companies as a means of enhancing shareholder values. Such suggestions or positions may relate to one or more of the transactions specified in clauses (a) through (j) of Item 4 of Schedule 13D including, without limitation, such matters as disposing of one or more businesses, selling the company or acquiring another company or business, changing operating or marketing strategies, adopting or not adopting, certain types of anti-takeover measures and restructuring the company's capitalization or dividend policy.

Each of the Reporting Persons intends to adhere to the foregoing investment philosophy with respect to the Issuer. However, none of the Reporting Persons intends to seek control of the Issuer or participate in the management of the Issuer, and any Reporting Person that is registered as an investment company under the Company Act will participate in such a transaction only following receipt of an exemption from the SEC under Rule 17d-1 under the Company Act, if required, and in accordance with other applicable law. In pursuing this investment philosophy, each Reporting Person will continuously assess the Issuer's business, financial condition, results of operations and prospects, general economic conditions, the securities markets in general and those for the Issuer's securities in particular, other developments and other investment opportunities, as well as the investment objectives and diversification requirements of its shareholders or clients and its fiduciary duties to such shareholders or clients. Depending on such assessments, one or more of the Reporting Persons may acquire additional Securities or may determine to sell or otherwise dispose of all or some of its holdings of Securities. Although the Reporting Persons share the same basic investment philosophy and although most portfolio decisions are made by or under the supervision of Mario Gabelli, the investment objectives and diversification requirements of various clients differ from those of other clients so that one or more Reporting Persons may be acquiring Securities while others are disposing of Securities.

With respect to voting of the Securities, the Reporting Persons have adopted general voting policies relating to voting on specified issues affecting corporate governance and shareholder values. Under these policies, the Reporting Persons generally vote all securities over which they have voting power in favor of cumulative voting, financially reasonable golden parachutes, one share one vote, management cash incentives and pre-emptive rights and against greenmail, poison pills, supermajority voting, blank check preferred stock and super-dilutive stock options. Exceptions may be made when management otherwise demonstrates superior sensitivity to the needs of shareholders. In the event that the aggregate voting position of all Reporting Persons exceeds 25% of the total voting position of the Issuer, one or more of the filing persons may transfer voting and/or dispositive power over shares to independent committees of directors or the owners of such shares. Such committees vote and/or consider disposition of such shares independently of the Reporting Persons.

Each of the Covered Persons who is not a Reporting Person has purchased the Securities reported herein as beneficially owned by him for investment for his own account or that of one or more members of his immediate family. Each such person may acquire additional Securities or dispose of some or all of the Securities reported herein with respect to him.

Other than as described above, none of the Reporting Persons and none of the Covered Persons who is not a Reporting Person has any present plans or proposals which relate to or would result in any transaction, change or event specified in clauses (a) through (j) of Item 4 of Schedule 13D.

Item 5. **Interest In Securities Of The Issuer**

(a) The aggregate number of Securities to which this Schedule 13D relates is 7,857,574 shares, representing 5.14% of the 152,896,181 shares outstanding as reported in the Issuer's most recent 10-Q for the quarterly period ended September 30, 2015. The Reporting Persons beneficially own those Securities as follows:

Name	Shares of Common Stock	% of Class of Common
GAMCO	5,149,724	3.37%
Gabelli Funds	2,493,700	1.63%
GSI	6,500	0.00%
Mario Gabelli	98,500	0.06%
Teton Advisors	105,000	0.07%
GBL	4,150	0.00%

Mario Gabelli is deemed to have beneficial ownership of the Securities owned beneficially by each of the foregoing persons. GSI is deemed to have beneficial ownership of the Securities owned beneficially by G.research. GBL and GGCP are deemed to have beneficial ownership of the Securities owned beneficially by each of the foregoing persons other than Mario Gabelli and the Foundation.

- (b) Each of the Reporting Persons and Covered Persons has the sole power to vote or direct the vote and sole power to dispose or to direct the disposition of the Securities reported for it, either for its own benefit or for the benefit of its investment clients or its partners, as the case may be, except that (i) GAMCO does not have the authority to vote 213,500 of the reported shares, (ii) Gabelli Funds has sole dispositive and voting power with respect to the shares of the Issuer held by the Funds so long as the aggregate voting interest of all joint filers does not exceed 25% of their total voting interest in the Issuer and, in that event, the Proxy Voting Committee of each Fund shall respectively vote that Fund's shares, (iii) at any time, the Proxy Voting Committee of each such Fund may take and exercise in its sole discretion the entire voting power with respect to the shares held by such fund under special circumstances such as regulatory considerations, and (iv) the power of Mario Gabelli, GBL, and GGCP is indirect with respect to Securities beneficially owned directly by other Reporting Persons.
- (c) Information with respect to all transactions in the Securities which were effected during the past sixty days or since the most recent filing on Schedule 13D, whichever is less, by each of the Reporting Persons and Covered Persons is set forth on Schedule II annexed hereto and incorporated herein by reference.
- (d) The investment advisory clients of, or partnerships managed by, GAMCO, Gabelli Funds, Teton Advisors and MJG Associates have the sole right to receive and, subject to the notice, withdrawal and/or termination provisions of such advisory contracts and partnership arrangements, the sole power to direct the receipt of dividends from, and the proceeds of sale of, any of the Securities beneficially owned by such Reporting Persons on behalf of such clients or partnerships. Except as noted, no such client or partnership has an interest by virtue of such relationship that relates to more than 5% of the Securities.
 - (e) Not applicable.

Item 6. Contracts, Arrangements, Understandings or Relationships with Respect to Securities of the Issuer

The powers of disposition and voting of Gabelli Funds, Teton Advisors, GAMCO, GSI and MJG Associates with respect to Securities owned beneficially by them on behalf of their investment advisory clients, and of MJG Associates and GSI with respect to Securities owned beneficially by them on behalf of the partnerships or corporations which they directly or indirectly manage, are held pursuant to written agreements with such clients, partnerships and funds.

Item 7. <u>Material to be Filed as an Exhibit</u>

The following Exhibit A is attached hereto. The following Exhibit B is incorporated by reference to Exhibit B in the Initial Schedule 13D of the Reporting Persons with respect to Lincare Holdings Inc.

Exhibit A: Joint Filing Agreement

Exhibit B: Powers of Attorney to David M. Goldman and Douglas R. Jamieson from Mario J. Gabelli individually and/or as an executive

officer or director of any entity of which Mr. Gabelli serves.

<u>Signature</u>

After reasonable inquiry and to the best of my knowledge and belief, I certify that the information set forth in this statement is true, complete and correct.

Dated: October 28, 2015

GGCP, INC. MARIO J. GABELLI

By:/s/ Douglas R. Jamieson Douglas R. Jamieson Attorney-in-Fact

GAMCO ASSET MANAGEMENT INC. GAMCO INVESTORS, INC. GABELLI SECURITIES, INC. GABELLI FUNDS, LLC

By:/s/ Douglas R. Jamieson

Douglas R. Jamieson
President & Chief Operating Officer – GAMCO Investors, Inc.
President – GAMCO Asset Management Inc.
President – Gabelli Securities, Inc.
President & Chief Operating Officer of the sole member of Gabelli Funds, LLC.

TETON ADVISORS, INC.

By:/s/ David Goldman

David Goldman General Counsel – Teton Advisors, Inc.

SCHEDULE I

Information with Respect to Executive Officers and Directors of the Undersigned

Schedule I to Schedule 13D is amended, in pertinent part, as follows:

The following sets forth as to each of the executive officers and directors of the undersigned: his name; his business address; his present principal occupation or employment and the name, principal business and address of any corporation or other organization in which such employment is conducted. Unless otherwise specified, the principal employer of each such individual is GAMCO Asset Management Inc., Gabelli Funds, LLC, Gabelli Securities, Inc., G., research, Inc., Teton Advisors, Inc., or GAMCO Investors, Inc., the business address of each of which is One Corporate Center, Rye, New York 10580, and each such individual identified below is a citizen of the United States. To the knowledge of the undersigned, during the last five years, no such person has been convicted in a criminal proceeding (excluding traffic violations or similar misdemeanors), and no such person was a party to a civil proceeding of a judicial or administrative body of competent jurisdiction as a result of which he was or is subject to a judgment, decree or final order enjoining future violations of, or prohibiting or mandating activities subject to, federal or state securities law or finding any violation with respect to such laws except as reported in Item 2(d) and (e) of this Schedule 13D.

GAMCO Investors, Inc.

Directors:

Edwin L. Artzt Former Chairman and Chief Executive Officer

Procter & Gamble Company 900 Adams Crossing Cincinnati, OH 45202

Raymond C. Avansino Chairman & Chief Executive Officer

E.L. Wiegand Foundation 165 West Liberty Street Reno, NV 89501

Richard L. Bready Former Chairman and Chief Executive Officer

Nortek, Inc. 50 Kennedy Plaza Providence, RI 02903

Marc Gabelli Chairman of The LGL Group, Inc.

2525 Shader Road Orlando, FL 32804

Mario J. Gabelli Chief Executive Officer of GGCP, Inc., and Chairman & Chief Executive Officer of GAMCO

Investors, Inc.; Director/Trustee of all registered investment companies advised by Gabelli Funds,

LLC.

Elisa M. Wilson Director

c/o GAMCO Investors, Inc. One Corporate Center Rye, NY 10580

Eugene R. McGrath Former Chairman and Chief Executive Officer

Consolidated Edison, Inc.

4 Irving Place New York, NY 10003

Robert S. Prather President & Chief Executive Officer

Heartland Media, LLC 1843 West Wesley Road Atlanta, GA 30327

Officers:

Mario J. Gabelli Chairman and Chief Executive Officer

Douglas R. Jamieson President and Chief Operating Officer

Henry G. Van der Eb Senior Vice President

Bruce N. Alpert Senior Vice President

Agnes Mullady Senior Vice President

Robert S. Zuccaro Executive Vice President and Chief Financial Officer

Kevin Handwerker Executive Vice President, General Counsel and Secretary

GAMCO Asset Management Inc.

Directors:

Douglas R. Jamieson Regina M. Pitaro William S. Selby

Officers:

Mario J. Gabelli Chief Executive Officer and Chief Investment Officer – Value Portfolios

President, Chief Operating Officer and Managing Director Douglas R. Jamieson Robert S. Zuccaro Chief Financial Officer David Goldman General Counsel, Secretary & Chief Compliance Officer Gabelli Funds, LLC Officers: Mario J. Gabelli Chief Investment Officer – Value Portfolios Bruce N. Alpert Executive Vice President and Chief Operating Officer Agnes Mullady President and Chief Operating Officer - Open End Fund Division Chief Financial Officer Robert S. Zuccaro David Goldman General Counsel Gabelli Securities, Inc. Directors: Robert W. Blake President of W. R. Blake & Sons, Inc. 196-20 Northern Boulevard Flushing, NY 11358 Douglas G. DeVivo Co-Chairman of the Board and DeVivo Asset Management Company LLC P.O. Box 2048 Menlo Park, CA 94027 Marc J. Gabelli Co-Chairman of the Board President Douglas R. Jamieson Daniel R. Lee Chief Executive Officer Full House Resorts, Inc. 4670 South Ford Apache Road, Suite 190 Las Vegas, NV 89147 William C. Mattison, Jr. Vice Chairman Salvatore F. Sodano Officers: Douglas R. Jamieson See above Robert S. Zuccaro Chief Financial Officer Diane M. LaPointe Controller Kevin Handwerker Secretary David M. Goldman General Counsel & Assistant Secretary David Fitzgerald Chief Compliance Officer G.research, Inc. Directors: Daniel M. Miller Chairman Cornelius V. McGinity President Daniel M. Miller See above Cornelius V. McGinity See above Bruce N. Alpert Vice President

Officers:

Diane M. LaPointe Controller and Financial & Operations Principal

Douglas R. Jamieson Secretary

David M. Goldman **Assistant Secretary**

Josephine D. LaFauci Chief Compliance Officer

Gabelli Foundation, Inc. Officers:	
Mario J. Gabelli	Chairman, Trustee & Chief Investment Officer
Elisa M. Wilson	President
Marc J. Gabelli	Trustee
Matthew R. Gabelli	Trustee
Michael Gabelli	Trustee
MJG-IV Limited Partnership Officers:	
Mario J. Gabelli	General Partner

Directors:	
Mario J. Gabelli	Chief Executive Officer of GGCP, Inc., and Chairman & Chief Executive Officer of GAMCO Investors, Inc.; Director/Trustee of all registered investment companies advised by Gabelli Funds, LLC.
Marc J. Gabelli	Chairman of The LGL Group, Inc. 2525 Shader Road Orlando, FL 32804
Matthew R. Gabelli	Vice President – Trading G.research, Inc. One Corporate Center Rye, NY 10580
Michael Gabelli	President & COO Gabelli & Partners, LLC One Corporate Center Rye, NY 10580
Charles C. Baum	Secretary & Treasurer United Holdings Co., Inc. 2545 Wilkens Avenue Baltimore, MD 21223
Fredric V. Salerno	Chairman; Former Vice Chairman and Chief Financial Officer Verizon Communications
Officers:	
Mario J. Gabelli Marc J. Gabelli Silvio A. Berni	Chief Executive Officer and Chief Investment Officer President Vice President, Assistant Secretary and Controller
GGCP Holdings LLC Members:	
GGCP, Inc.	Manager and Member
Mario J. Gabelli	Member

Teton Advisors, Inc.

Directors:

Howard F. Ward Chairman of the Board

Nicholas F. Galluccio Chief Executive Officer and President

Vincent J. Amabile

John Tesoro

Officers:

Howard F. Ward See above

Nicholas F. Galluccio See above

Robert S. Zuccaro Chief Financial Officer

David Goldman General Counsel

Tiffany Hayden Secretary

SCHEDULE II

INFORMATION WITH RESPECT TO

TRANSACTIONS EFFECTED DURING THE PAST SIXTY DAYS OR

SINCE THE MOST RECENT FILING ON SCHEDULE 13D (1)

SHARES PURCHASED AVERAGE

DATE SOLD(-) PRICE(2)
COMMON STOCK-DANA HOLDING CORPORATION

MARIO J. GABELLI

10/22/15 13,000 15.8702 10/05/15 3,000 16.7338

GAMCO ASSET MANAGEMENT INC.

10/27/15 2,400 16.2577 1,200 10/27/15 16.2867 10/23/15 3,000 15.5740 10/23/15 3,700 16.2300 10/23/15 10,000 16.4100 10/22/15 400

 10/22/15
 400
 16.0265

 10/22/15
 1,000
 15.9844

 10/22/15
 12,400
 15.9301

 10/22/15
 47,000
 15.8548

 10/22/15
 2,000
 15.6760

 10/22/15
 600
 16.0374

 10/21/15
 6,500
 17.1082

 10/19/15
 400
 17.4100

 10/14/15
 6,000
 17.4473

 10/13/15
 1,000
 17.8550

 10/12/15
 4,000
 17.9400

 10/07/15
 5,000
 17.5960

 10/07/15
 5,000
 17.6875

 10/06/15
 300
 16.9300

 10/06/15
 1,000
 16.9785

 10/05/15
 7,200
 16.9540

 10/05/15
 22,600
 16.8102

 10/02/15
 3,500
 15.8769

10/02/15 17,500 15.8781 9/30/15 500 15.8780

9/28/15 1,800 15.7200

9/25/15 12,000- 15.8866 9/24/15 8,000- 15.8314

9/23/15 500- 16.4197 9/23/15 1,500- 16.3505

9/23/15 4,000- 16.3494

9/23/15 300- 16.3397 9/15/15 2,500- 17.3619

9/10/15 500- 17.1797 9/10/15 600- 17.2097

9/08/15 1,500 17.2493

 9/01/15
 500 16.6997

 8/31/15
 2,000
 17.5900

8/31/15 1,500 17.5993 8/31/15 200 17.4200

GABELLI FUNDS, LLC. GABELLI VALUE PLUS+ TRUST

 10/23/15
 10,000
 15.9300

 10/22/15
 10,000
 15.6300

GABELLI SMALL CAP GROWTH FUND 10/22/15 15,000 15.2070

GABELLI GLOBAL SMALL AND MIDCAP VALUE TRUST

9/17/15 2,000 17.9000

GABELLI GLOBAL RISING INCOME & DIVIDEND FUND				
10/22/15	3,000	16.1300		
GABELLI EQUI	TY INCOM	E FUND		
10/22/15	20,000	15.6039		
GABELLI ASSE	T FUND			
9/02/15	3,000-	16.7855		
8/28/15	3,000-	17.4147		
GAMCO ALL CAP VALUE				
10/22/15	1,500	15.8000		
10/05/15	300	16.4823		

(1) UNLESS OTHERWISE INDICATED, ALL TRANSACTIONS WERE EFFECTED ON THE NYSE.

(2) PRICE EXCLUDES COMMISSION.

JOINT FILING AGREEMENT

In accordance with Rule 13d-1(f) under the securities Exchange Act of 1934, as amended, the undersigned hereby agree to the joint filing with all other Reporting Entities (as such term is defined in the Schedule 13D referred to below) on behalf of each of them of a statement on Schedule 13D (including amendments thereto) with respect to the Common Stock of Dana Holding Corporation and that this Agreement be included as an Exhibit to such joint filing. This Agreement may be executed in any number of counterparts all of which taken together shall constitute one and the same instrument.

IN WITNESS WHEREOF, the undersigned hereby execute this Agreement this October 28, 2015.

MARIO J. GABELLI GGCP, INC. MJG ASSOCIATES, INC. GABELLI FOUNDATION, INC. MJG-IV LIMITED PARTNERSHIP

By:/s/ Douglas R. Jamieson Douglas R. Jamieson Attorney-in-Fact

TETON ADVISORS, INC.

By: /s/ David Goldman David Goldman General Counsel

GAMCO ASSET MANAGEMENT INC. GAMCO INVESTORS, INC. GABELLI SECURITIES, INC. G.RESEARCH, INC. GABELLI FUNDS, LLC

By:/s/ Douglas R. Jamieson

Douglas R. Jamieson

President & Chief Operating Officer – GAMCO Investors, Inc.

 $President-GAMCO\ Asset\ Management\ Inc.$

Vice President – Gabelli Securities, Inc.

Secretary – G.research, Inc.

President & Chief Operating Officer - sole member of

Gabelli Funds, LLC