

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

DIVISION OF CORPORATION FINANCE

Mailstop 3233

October 1, 2015

<u>Via E-mail</u> Mr. Roderick Day Chief Financial Officer Iron Mountain Incorporated One Federal Street Boston, MA 02110

> Re: Iron Mountain Incorporated Form 10-K for the fiscal year ended December 31, 2014 Filed February 27, 2015 File No. 1-13045

> > Form 10-Q for the quarterly period ended June 30, 2015 Filed July 30, 2015 File No. 1-13045

Dear Mr. Day:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings 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. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information in the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Robert F. Telewicz, Jr.

Robert F. Telewicz, Jr. Accounting Branch Chief Office of Real Estate and Commodities