



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4628

June 22, 2016

Via E-mail

Chris Kennedy  
Chief Financial Officer  
ARM Holdings plc  
110 Fulbourn Road  
Cambridge CB1 9NJ, England

**Re: ARM Holdings plc**  
**Form 20-F for Fiscal Year Ended December 31, 2015**  
**Filed February 18, 2016**  
**File No. 0-29644**

Dear Mr. Kennedy

We refer you to our comment letter dated May 18, 2016, regarding business contacts with Sudan and Syria. We have completed our review of this subject matter. 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 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. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Cecilia Blye

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Amanda Ravitz  
Assistant Director  
Division of Corporation Finance

Philip Davis  
General Counsel and Secretary  
ARM Holdings plc