



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

DIVISION OF
CORPORATION FINANCE

Mail Stop 4631

December 15, 2017

Via E-Mail

Mr. Bradley C. Richardson
Executive Vice President and Chief Financial Officer
PolyOne Corporation
33587 Walker Road
Avon Lake, Ohio 44012

**Re: PolyOne Corporation
Form 10-K
Filed February 16, 2017
File No. 1-16091**

Dear Mr. Richardson:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ Terence O'Brien

Terence O'Brien
Branch Chief
Office of Manufacturing and
Construction