



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

Mail Stop 3720

April 28, 2009

Michael C. McCarthy III  
Chief Legal Officer and Corporate Secretary  
Infinera Corporation  
169 Java Drive  
Sunnyvale, CA 94089

**Re: Infinera Corporation  
Preliminary Proxy Statement on Schedule 14A  
Filed April 10, 2009  
File No. 001-33486**

Dear Mr. McCarthy:

We have completed our review of your proxy statement and have no further comments at this time.

Sincerely,

Larry Spigel  
Assistant Director

Cc: Richard A. Kline (via facsimile)