



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 3720

May 4, 2009

Mr. Duston M. Williams  
Chief Financial Officer  
Infinera Corporation  
169 Java Drive  
Sunnyvale, CA 94089

**Re: Infinera Corporation  
Form 10-K for the Fiscal Year Ended December 27, 2008  
Filed February 17, 2009  
File No. 1-33506**

Dear Mr. Williams:

The Division of Corporation Finance has completed its review of your Form 10-K and does not, at this time, have any further comments.

Sincerely,

Larry Spigel  
Assistant Director