



DIVISION OF
CORPORATION FINANCE

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

December 6, 2013

Via E-mail

Ms. Ita M. Brennan
Chief Financial Officer
Infinera Corporation
169 Java Drive
Sunnyvale, CA 94089

Re: Infinera Corporation
Form 10-K for the fiscal year ended December 29, 2012
Filed March 5, 2013
File No. 001-33486

Dear Ms. Brennan:

We have completed our review of your filing. 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 include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Carlos Pacheco for

Larry Spigel
Assistant Director