



DIVISION OF
CORPORATION FINANCE

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

Mail Stop 4628

July 19, 2017

Via E-mail

Syed B. Ali
President and Chief Executive Officer
Cavium, Inc.
2315 N. First Street
San Jose, CA 95131

Re: Cavium, Inc.
10-K for Fiscal Year Ended December 31, 2016
Filed February 28, 2017
File No. 001-33435

Dear Mr. Ali:

We refer you to our comment letter dated June 28, 2017, regarding business contacts with Sudan and Syria. We have completed our review of this subject matter. 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/ Cecilia Blye

Cecilia Blye, Chief
Office of Global Security Risk

cc: Amanda Ravitz
Assistant Director
Division of Corporation Finance

Vincent P. Pangrazio
General Counsel
Cavium, Inc.