



DIVISION OF  
CORPORATION FINANCE

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

November 18, 2021

Leanne Cunningham  
Chief Financial Officer  
Brown-Forman Corporation  
850 Dixie Highway  
Louisville, Kentucky 40210

**Re: Brown-Forman Corporation**  
**Form 10-K for the Fiscal Year Ended April 30, 2021**  
**Filed June 21, 2021**  
**File No. 001-00123**

Dear Ms. Cunningham:

We have reviewed your November 15, 2021 response to our comment letter and have the following comment.

Please respond to this comment within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comment apply to your facts and circumstances, please tell us why in your response.

After reviewing your response to this comment, we may have additional comments. Our reference to prior comment is to comment in our November 2, 2021 letter.

Form 10-K for the Fiscal Year Ended April 30, 2021

Management's Discussion and Analysis of Financial Condition and Results of Operations, page 31

1. We note your response to prior comment 1. The adjustment for "estimated net change in distributor inventories" appears to change the recognition method of your GAAP measures from a sell-in approach to a sell-through approach, and therefore, appears to substitute individually tailored recognition and measurement methods for those of GAAP. Please remove this adjustment from future filings or explain why you do not believe it represents a tailored accounting measure.

Leanne Cunningham  
Brown-Forman Corporation  
November 18, 2021  
Page 2

You may contact Eiko Yaoita Pyles, Staff Accountant, at 202-551-3587 or Andrew Blume, Staff Accountant, at 202-551-3254 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Manufacturing