



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

DIVISION OF  
CORPORATION FINANCE

July 24, 2019

Daniel H. Schulman  
President and Chief Executive Officer  
PayPal Holdings, Inc.  
2211 North First Street  
San Jose, California 95131

**Re: PayPal Holdings, Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2018**  
**Filed February 7, 2019**  
**File No. 001-36859**

Dear Mr. Schulman:

We have completed our review of your filing. 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,

Division of Corporation Finance  
Office of Consumer Products