



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

DIVISION OF  
CORPORATION FINANCE

May 15, 2019

Dean Freeman  
Chief Financial Officer  
GCP Applied Technologies Inc.  
62 Whittemore Avenue  
Cambridge, MA 02140-1623

**Re: GCP Applied Technologies Inc.**  
**Form 10-K for Fiscal Year Ended December 21, 2018**  
**Filed February 27, 2019**  
**File No. 001-137533**

Dear Mr. Freeman:

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 Manufacturing and  
Construction