



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4720

March 13, 2018

Kenneth A. Lewis  
Chief Financial Officer  
Franklin Resources, Inc.  
One Franklin Parkway  
San Mateo, California 94403

**Re: Franklin Resources, Inc.  
Form 10-K for the Fiscal Year Ended September 30, 2017  
Filed November 13, 2017  
File No. 001-09318**

Dear Mr. Lewis:

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,

/s/ Hugh West

Hugh West  
Accounting Branch Chief  
Office of Financial Services