



DIVISION OF  
CORPORATION FINANCE

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

July 20, 2020

Richard Seidlitz  
Corporate Controller  
ARROW ELECTRONICS INC  
9201 East Dry Creek Road  
Centennial, CO 80112

**Re: ARROW ELECTRONICS INC**  
**Form 10-K for the Fiscal Year Ended December 31, 2019**  
**Filed February 13, 2020**  
**Form 8-K Filed February 6, 2020**  
**File No. 1-4482**

Dear Mr. Seidlitz:

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 Trade & Services