



DIVISION OF  
CORPORATION FINANCE

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

June 9, 2015

Mr. Arun Nayar  
Executive Vice President and Chief Financial Officer  
Tyco International plc  
Unit 1202 Building 1000 City Gate  
Mahon, Cork Ireland

**Re: Tyco International plc**  
**Form 10-K for the Fiscal Year Ended September 26, 2014**  
**Filed November 14, 2014**  
**File No. 001-13836**

Dear Mr. Nayar:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or its filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Robert S. Littlepage, for

Carlos Pachó  
Senior Assistant Chief Accountant

cc: Judith Reinsdorf – General Counsel