



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4628

May 2, 2018

Via E-Mail

Gregory S. Lovins  
Senior Vice President and Chief Financial Officer  
Avery Dennison Corporation  
207 Goode Avenue  
Glendale, CA 91203

**Re: Avery Dennison Corporation  
Form 10-K for the Fiscal Year Ended December 30, 2017  
Filed February 21, 2018  
File No. 1-07685**

Dear Mr. Lovins:

We refer you to our comment letter dated March 27, 2018 regarding potential business contacts with Syria and Sudan. We have completed our review of this subject matter. 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/ Cecilia Blye

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Vikas Arora, Securities Counsel  
Avery Dennison Corporation