

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

September 7, 2018

Peter S. Garcia Chief Financial Officer PDL BioPharma, Inc. 932 Southwood Boulevard Incline Village, Nevada 89451

> Re: PDL BioPharma, Inc. Form 10-K for Fiscal Year Ended December 31, 2017 Filed March 16, 2018 File No. 000-19756

Dear Mr. Garcia:

We have completed our review of your filings. 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 Healthcare & Insurance