

Mail Stop 3561

May 13, 2008

Ms. Jill Granoff, CEO
Kenneth Cole Productions, Inc.
603 West 50th Street
New York, New York 10019

**Re: Kenneth Cole Productions, Inc.
Form 10-K for Fiscal Year Ended
December 31, 2007
Filed March 9, 2008
File No. 001-13082**

Dear Ms. Granoff:

We have reviewed your filing and have the following comment. Where indicated, we think you should revise your document in response to this comment. If you disagree, we will consider your explanation as to why our comment is inapplicable or a revision is unnecessary. Please be as detailed as necessary in your explanation. We have asked you to provide us with additional information so we may better understand your disclosure. Please do so within the time frame set forth below. You should comply with the comment in all future filings, as applicable. Please confirm in writing that you will do so and also explain to us how you intend to comply, within the time frame set forth below. Please understand that after our review of your response, we may raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comment or any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

Management's Discussion and Analysis

1. Please provide a discussion of the losses on the auction rate securities as they appear to represent a recurring trend as well as your accounting for these losses in

Management's Discussion and Analysis and the Critical Accounting Policies and Estimates section.

Note 4 – Investments, page F-14

2. Tell us and revise to disclose how you determined the fair value of the auction rate securities and describe each input reviewed in this process.
3. Please tell us whether any portion of the unrealized loss on available-for-sale securities was related to the auction rate securities. If so, tell us and revise to explain how you determined the amount of loss accounted for as other-than-temporary and the amount accounted for as a temporary loss.

Schedule 14A

Compensation Discussion and Analysis, page 14

4. While you list the fiscal 2007 performance measures, you have not provided quantitative disclosure of the terms of the necessary targets to be achieved for your named executive officers to earn their annual incentive compensation. Please confirm that in future filings you will disclose the specific performance targets used to determine incentive amounts or provide a supplemental analysis as to why it is appropriate to omit these targets pursuant to Instruction 4 to Item 402(b) of Regulation S-K. Your supplemental response should address your targets for the 2007 fiscal year, as disclosed in the definitive proxy statement filed on April 18, 2008. To the extent that it is appropriate to omit specific targets, please provide the disclosure pursuant to Instruction 4 to Item 402(b) of Regulation S-K. General statements regarding the level of difficulty, or ease, associated with achieving performance goals either corporately or individually are not sufficient. In discussing how likely it will be for the company to achieve the target levels or other factors, provide as much detail as necessary without providing information that poses a reasonable risk of competitive harm.

Closing comments

As appropriate, please respond to this comment within 10 business days or tell us when you will provide us with a response. We are seeking the requested disclosure of targets in future filings. If you decide to omit it, you should provide us your supplemental analysis now. Please understand that we may have additional comments after reviewing your response to our comment.

Ms. Jill Granoff
Kenneth Cole Productions, Inc.
May 13, 2008
Page 3

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 all information required under the Securities Exchange Act of 1934 and that they have provided all information investors require for an informed investment decision. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In connection with responding to our comment, please provide, in writing, a statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the 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.

In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filing or in response to our comments on your filing.

Please contact Cathey Baker at (202) 551-3326 with any questions.

Sincerely,

John Reynolds
Assistant Director