



DIVISION OF  
CORPORATION FINANCE

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

July 22, 2014

Via E- Mail

Mr. Robin Freestone  
Chief Financial Officer  
Pearson PLC  
80 Strand  
London, WC2R 0RL  
United Kingdom

**Re: Pearson PLC**  
**Form 20-F for the year ended December 31, 2013**  
**Filed March 27, 2014**  
**File No. 001-16055**

Dear Mr. Freestone:

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 the filings 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 filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Linda Cvrkel

Linda Cvrkel  
Branch Chief