

April 2, 2018

FILED VIA EDGAR AND UPS

Securities and Exchange Commission Division of Corporation Finance 100 F Street, NE Washington, DC 20549 Attention: Cecilia Blye

Chief, Office of Global Security Risk

Re: Avery Dennison Corporation

Form 10-K for Fiscal Year Ended December 30, 2017

Filed February 21, 2018

File No. 1-7685

Ladies and Gentlemen:

Avery Dennison Corporation (the "Company") acknowledges receipt of the March 27, 2018 comment letter (the "Comment Letter") from the Office of Global Security Risk of the Securities and Exchange Commission to Gregory S. Lovins, the Company's Senior Vice President and Chief Financial Officer. The Company requests a small extension of time to respond. The Company intends to file its response via EDGAR on or before Friday, May 4, 2018.

If you have any questions or concerns, please do not hesitate to contact the undersigned at (626) 304-2000.

Sincerely,

/s/ Gregory S. Lovins

Gregory S. Lovins Senior Vice President and Chief Financial Officer