



DIVISION OF  
CORPORATION FINANCE

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

January 30, 2015

Via E-mail

Mitchell R. Butier  
Senior Vice President and Chief Financial Officer  
Avery Dennison Corporation  
207 Goode Avenue  
Glendale, California 91203

**Re: Avery Dennison Corporation  
Form 10-K for Fiscal Year Ended  
December 28, 2013  
Filed February 26, 2014  
File No. 001-07685**

Dear Mr. Butier:

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 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. 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 the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Ethan Horowitz

Ethan Horowitz  
Branch Chief