



DIVISION OF
CORPORATION FINANCE

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

December 16, 2011

Via E-Mail

Mr. Todd Kahn
Senior Vice President and General Counsel
Coach, Inc.
516 West 34th Street
New York, New York 10001

Re: Coach, Inc.
Form 10-K for Fiscal Year Ended July 2, 2011
Filed August 19, 2011
Form 8-K
Filed August 2, 2011
File No. 001-16153

Dear Mr. Kahn:

We have completed our review of your filings. 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/Tia L. Jenkins

Tia L. Jenkins
Senior Assistant Chief Accountant
Office of Beverages, Apparel and
Mining