Mail Stop 3561

December 23, 2009

Mr. Michael F. Devine, III Chief Financial Officer Coach, Inc. 516 W 34th Street New York, NY 10001

> Re: Coach, Inc. Form 10-K for Fiscal Year Ended June 27, 2009 File No. 001-16153

Dear Mr. Devine:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Tia Jenkins Senior Assistant Chief Accountant Office of Beverages, Apparel and Health Care Services