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May 3, 2016

**VIA EDGAR TRANSMISSION**

U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549

Re: Registration Statement on Form 10 for Yum! China Holding, Inc.

Ladies and Gentlemen:

On behalf of our client, Yum! China Holding, Inc. ("SpinCo"), a Delaware corporation and a wholly owned subsidiary of Yum! Brands, Inc. ("YUM"), we are submitting for filing with the U.S. Securities and Exchange Commission a registration statement on Form 10 for the registration of shares of SpinCo's common stock under Section 12(b) of the U.S. Securities Exchange Act of 1934, as amended, in connection with YUM's planned distribution of shares of SpinCo common stock to YUM's shareholders.

If you have any questions regarding this filing, please contact the undersigned at BMRoth@WLRK.com or (212) 403-1378, or Scott Catlett, Vice President and Deputy General Counsel at YUM, at scott.catlett@yum.com or (502) 874-8300.

Sincerely,

/s/ Benjamin M. Roth  
Benjamin M. Roth