



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4546

December 05, 2016

VIA E-mail

Mr. John P. McLaughlin  
President and Chief Executive Officer  
PDL BioPharma, Inc.  
932 Southwood Boulevard,  
Incline Village, Nevada 89451

**Re: PDL BioPharma, Inc.  
Form 10-K for Fiscal Year Ended December 31, 2015  
Filed February 23, 2016  
File No. 000-19756**

Dear Mr. McLaughlin:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ Angela M. Connell

Angela M. Connell  
Accounting Branch Chief  
Office of Healthcare and Insurance