Tyco Electronics Group S.A. Form S-4/A March 11, 2008

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Tyco Electronics Ltd. 96 Pitts Bay Road, Second Floor Pembroke HM 08, Bermuda

Tyco Electronics Group S.A.
17, Boulevard de la Grande Duchesse Charlotte
L-1331 Luxembourg

March 11, 2008

BY EDGAR

Securities and Exchange Commission 100 F Street, N.E. Washington, D.C. 20549 Attention: Gabriel Eckstein

Re:

Tyco Electronics Group S.A.

Tyco Electronics Ltd. Form S-4 File No. 333-149505

Ladies and Gentlemen:

On March 3, 2008, Tyco Electronics Group S.A., a Luxembourg company, and Tyco Electronics Ltd., a Bermuda company (together, the "Registrants"), filed a Registration Statement on Form S-4 (File No. 333-149505) (the "Registration Statement") with the Securities and Exchange Commission. The Registration Statement relates to the proposed offering of new \$800,000,000 6.000% senior notes due 2012 in exchange for outstanding \$800,000,000 6.000% senior notes due 2012, new \$750,000,000 6.550% senior notes due 2017 in exchange for outstanding \$750,000,000 6.550% senior notes due 2017 and new \$500,000,000 7.125% senior notes due 2037 in exchange for outstanding \$500,000,000 7.125% senior notes due 2037, and related guarantees. The Registrants hereby amend the Registration Statement to include on the cover page the delaying amendment language set forth below:

The Registrants hereby amend this Registration Statement on such date or dates as may be necessary to delay its effective date until the Registrants shall file a further amendment which specifically states that this Registration Statement shall thereafter become effective in accordance with Section 8(a) of the Securities Act of 1933 or until the Registration Statement shall become effective on such date as the Securities and Exchange Commission, acting pursuant to said Section 8(a), may determine.

If you have any further questions or require additional information, please contact the undersigned at (610) 893-9560.

Thank you for your courtesy and cooperation.

Very truly yours,

TYCO ELECTRONICS LTD.

By: /s/ ROBERT A. SCOTT

Robert A. Scott

Executive Vice President and General Counsel

TYCO ELECTRONICS GROUP S.A.

By: /s/ MARIO CALASTRI

Mario Calastri *Director* 

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### APPROVED FOR TYCO ELECTRONICS LTD. BY:

Signature	Title
*	Chief Executive Officer and Director and Authorized Representative in the United
Thomas J. Lynch	States (Principal Executive Officer)
*	Executive Vice President and Chief Financial Officer (Principal Financial Officer)
Terrence R. Curtin	
*	Senior Vice President and Corporate Controller (Principal Accounting Officer)
Robert J. Ott	
*	Director
Pierre R. Brondeau	Director
*	Director
Ram Charan	Birector
*	Director
Juergen W. Gromer	
*	Director
Robert M. Hernandez	
*	Director
Daniel J. Phelan	
*	Director, Chairman of the Board
Frederic M. Poses	
*	Director
Lawrence S. Smith	
*	Director
Paula A. Sneed	

	*	D'
	David P. Steiner	<ul><li>Director</li></ul>
	*	
	Sandra S. Wijnberg	Director
*	The undersigned does hereby sign this Registra Electronics Ltd. pursuant to a power of attorne	ation Statement on behalf of the above-indicated director or officer of Tyco by executed by such director or officer.
	/s/ ROBERT A. SCOTT	
	Robert A. Scott	Executive Vice President and General Counsel

APPROVED FOR TYCO ELECTRONICS GROUP S.A. BY:

Signature	Title
/s/ MARIO CALASTRI	
Mario Calastri	Director (Principal Executive Officer)
*	
Bryan Tidd	Director (Principal Financial and Accounting Officer)
*	
H. Gregory Barksdale	Director and Authorized Representative in the United States
*	Diseases
Juerg Frischknecht	Director
*	Director
Steve Greenwood	Director
*	Director
David Hasson	——— Director
*	Director
Gourang Shah	Director
*	Director
Christoph Zeyen	Bilector
* The undersigned does hereby sign this Registration Group S.A. pursuant to a power of attorney execute	a Statement on behalf of the above-indicated director of Tyco Electronics ed by such director.
/s/ MARIO CALASTRI	Director
Mario Calastri	Director

#### QuickLinks

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