

**BERRY PLASTICS GROUP, INC.**  
101 Oakley Street  
Evansville, Indiana 47710

December 14, 2016

**VIA EDGAR**

United States Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, DC 20549-701  
Attention: Ms. Pamela Long, Assistant Director

Re: **Berry Plastics Group, Inc.**  
**Form S-4, File No. 333-213803**

Ladies and Gentlemen:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, and in connection with the captioned registration statement (the "Registration Statement"), Berry Plastics Group, Inc. (the "Company") hereby requests that the Registration Statement be permitted to become effective on December 15, 2016 at 4:00 p.m., Eastern Time, or as soon thereafter as practicable.

If you have any questions or comments, please do not hesitate to contact me at (812) 306-2764 or Eliot W. Robinson, Esq. of Bryan Cave LLP at (404) 572-6785.

Very truly yours,

**BERRY PLASTICS GROUP, INC.**

By: /s/ Jason K. Greene  
Jason K. Greene  
Chief Legal Officer

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