

July 14, 2009

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VIA EDGAR, FACSIMILE AND FEDERAL EXPRESS

Melissa Campbell Duru, Esq.
Special Counsel
Office of Mergers & Acquisitions
United States Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-3628

**Re: Advanced Micro Devices, Inc.
Schedule TO-I
File No. 005-07443**

Dear Ms. Duru:

On behalf of Advanced Micro Devices, Inc. (the "Company"), we are acknowledging receipt of and responding to a comment received telephonically on July 14, 2009 from the staff (the "Staff") of the Securities and Exchange Commission with respect to the above-referenced Schedule TO-I, as amended (the "Schedule TO").

In response to the Staff's comment, the Company supplementally confirms to the Staff that:

- the only employees who reside outside of the United States whom the Company is currently excluding from the offer to exchange described in the Schedule TO (the "Offer") are those employees who reside in Russia; and
- the Company will not exclude from the Offer any other employees who reside outside of the United States except for compensatory reasons, consistent with the global exemptive order applicable to employee stock option exchanges (Issuer Exchange Offers Conducted for Compensatory Purposes, March 21, 2001).

LATHAM & WATKINS LLP

We very much appreciate the Staff's prompt review of this filing. The Company anticipates completing the Offer on the final day that participants can tender their options, which is scheduled for July 27, 2009. We therefore respectfully request that if the Staff has any additional questions or comments, please direct them as soon as possible to the undersigned at (650) 470-4877.

Very truly yours,

/s/ Andrew S. Williamson
Andrew S. Williamson, Esq.
of LATHAM & WATKINS LLP

cc: Faina Medzonsky, Esq., Advanced Micro Devices, Inc.
Hollis O'Brien, Esq., Advanced Micro Devices, Inc.
Tad J. Freese, Esq., Latham & Watkins LLP
Errol H. Hunter, Esq., Latham & Watkins LLP
Alice M. Chung, Esq., Latham & Watkins LLP