June 12, 2020

Patrick D. Hallinan Chief Financial Officer Fortune Brands Home & Security, Inc. 520 Lake Cook Road Deerfield, Illinois 60015-5611

& Security, Inc.

year ended December 31, 2019

2020

Dear Mr. Hallinan:

Re: Fortune Brands Home

Form 10-K for the

Filed February 26,

File No. 001-35166

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,

Division of Corporation Finance

Office of Real Estate & Construction