

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

DIVISION OF CORPORATION FINANCE

January 28, 2013

<u>Via E-mail</u> Mr. E. Lee Wyatt, Jr. Chief Financial Officer Fortune Brands Home & Security, Inc. 520 Lake Cook Road Deerfield, Illinois 60015

> RE: Fortune Brands Home & Security, Inc. Form 10-K for the Year Ended December 31, 2011 Filed February 22, 2012 File No. 1-35166

Dear Mr. Wyatt:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Rufus Decker

Rufus Decker Accounting Branch Chief