



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

Mail Stop 3030

August 24, 2009

Via Facsimile and U.S. Mail

Mr. Necip Sayiner  
Chief Executive Officer  
Silicon Laboratories Inc.  
400 West Cesar Chavez  
Austin, TX 78701

**Re: Silicon Laboratories Inc.  
Form 10-K for fiscal year ended January 3, 2009  
Filed February 11, 2009  
File No. 0-29823**

Dear Mr. Sayiner:

We have reviewed your letter dated August 12, 2009 and have the following comment. Where indicated, we think you should revise future filings in response to this comment. If you disagree, we will consider your explanation as to why our comment is inapplicable or a revision is unnecessary. Please be as detailed as necessary in your explanation. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure. After reviewing this information, we may raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comment or on any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

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Form 10-K for fiscal year ended January 3, 2009

Note 2. Significant Accounting Policies, page F-7

-Revenue Recognition, page F-10

1. We note your response to prior comment 3. We note that you defer revenue recognition due to the fact that you are not able to reasonably estimate the amount of possible reductions to the purchase price. In light of this significant uncertainty surrounding the amount that will ultimately be reflected in your consolidated statements of operations relating to these distributor arrangements, it appears that disclosure of the gross amount of deferred revenue that could be subject to changes as a result of the rights of return and price protection granted to customers could be material to an investor's understanding of your current and prospective future results of operations. Please revise your disclosures in MD&A in future filings to disclose the gross amounts of deferred costs and deferred revenue or otherwise explain to us why you do not believe this information would be material to an investor's understanding of the potential impact of the net deferred income on your future results of operations.

\* \* \* \*

As appropriate, please respond to these comments within 10 business days or tell us when you will provide us with a response. Please furnish a cover letter with your response that keys your responses to our comments and provides any requested information. Detailed cover letters greatly facilitate our review. Please understand that we may have additional comments after reviewing your amendment and responses to our comments.

You may contact David Burton, Staff Accountant, at (202) 551-3626 or me at (202) 551-3616 if you have questions regarding these comments. In this regard, do not hesitate to contact Kevin L. Vaughn, Accounting Branch Chief, at (202) 551-3643.

Sincerely,

Lynn Dicker  
Reviewing Accountant