UNITED STATES SECURITIES AND EXCHANGE COMMISSION November 30, 2010

ORDER GRANTING CONFIDENTIAL TREATMENT UNDER THE SECURITIES EXCHANGE ACT OF 1934

Yum! Brands, Inc.

File No. 1-13163 - CF# 25813

Yum! Brands, Inc. submitted an application under Rule 24b-2 requesting confidential treatment for information it excluded from the Exhibits to a Form 10-Q filed on October 12, 2010.

Based on representations by Yum! Brands, Inc. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibit will not be released to the public for the time period specified:

Exhibit 10.1 through December 31, 2016

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Justin Dobbie Special Counsel