

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

Mail Stop 3030

April 19, 2016

<u>Via E-mail</u> Anthony L. Mattacchione Chief Financial Officer and Senior Vice President Bruker Corporation 40 Manning Road Billerica, Massachusetts 01821

## Re: Bruker Corporation Form 10-K for the Fiscal Year Ended December 31, 2015 Filed February 29, 2016 File No. 000-30833

Dear Mr. Mattacchione:

We have limited our review of your filing to the financial statements and related disclosures and have the following comment. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this comment within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comment applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to this comment, we may have additional comments.

## Form 10-K for the Fiscal Year Ended December 31, 2015

Management's Discussion and Analysis of Financial Condition and Results of Operations, page 39

1. You present various non-GAAP measures throughout your MD&A. For example, you discuss non-GAAP revenue and gross profit measures on page 42, a non-GAAP operating income measure on page 43, and free cash flow on page 40. Please revise future filings to include all of the disclosures required by Item 10(e)(1)(i) of Regulation S-K whenever you present non-GAAP financial measures.

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We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable Exchange Act rules require. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In responding to our comments, please provide a written statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filing; 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.

You may contact Jeanne Bennett at (202) 551-3606 or Kate Tillan, Assistant Chief Accountant, at (202) 551-3604 with any questions. You may also reach me at (202) 551-3671.

Sincerely,

/s/ Kate Tillan for

Martin James Senior Assistant Chief Accountant Office of Electronics and Machinery