



DIVISION OF  
CORPORATION FINANCE

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

March 3, 2020

Ryan D. Campbell  
Chief Financial Officer  
Deere & Company  
One John Deere Place  
Moline, Illinois 61265

**Re: Deere & Company**  
**Form 10-K for the Fiscal Year Ended November 3, 2019**  
**Filed December 19, 2019**  
**File No. 001-04121**

Dear Mr. Campbell:

We have reviewed your filing and have the following comment. In our comment, 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 apply 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 Fiscal Year Ended November 3, 2019

Notes to Consolidated Financial Statements

Note 2. Summary of Significant Accounting Policies

Revenue Recognition, page 38

1. You disclose that certain goods are shipped to dealers on a consignment basis under which the risks and rewards of ownership are not transferred to the dealer at the time the goods are shipped, accordingly these sales are not recorded until a retail customer has purchased the goods. You also disclose that generally no right of return exists on the sales of equipment. Please explain to us the nature of these consignment arrangements. In this regard, tell us how you assessed whether the dealer obtains control of the goods before the retail customer purchases the goods and how such assessment impacts the timing of revenue recognition. Refer to ASC 606-10-25-23 through 26. Also, tell us the amount of revenue generated from these types of sales for each period presented.

Ryan D. Campbell  
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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.

You may contact Eiko Yaoita Pyles, Staff Accountant, at 202-551-3587 or Melissa Kindelan, Senior Staff Accountant, at 202-551-3564 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Technology