Room 4561 via fax (727) 538-7808

November 6, 2006

Robert M. Dutkowsky Chairman & CEO Tech Data Corporation 5350 Tech Data Drive Clearwater, FL 33760

Re: Tech Data Corporation

Form 10-K for Fiscal Year Ended January 31, 2006

Filed April 3, 2006

Form 8-K Dated August 23, 2006

Form 10-Q for Quarter Ended July 31, 2006

Filed September 7, 2006

File No. 000-14625

Dear Mr. Dutkowsky:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Kathleen Collins Accounting Branch Chief