



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4561

October 6, 2016

Lainie Goldstein  
Chief Financial Officer  
Take-Two Interactive Software, Inc.  
622 Broadway  
New York, New York 10012

**Re: Take-Two Interactive Software, Inc.  
Form 10-K for the Fiscal Year Ended March 31, 2016  
Filed May 19, 2016  
File No. 001-34003**

Dear Ms. Goldstein:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or 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. 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 rules require.

Sincerely,

/s/ Kathleen Collins

Kathleen Collins  
Accounting Branch Chief  
Office of Information Technologies  
and Services