Mail Stop 7010

By U.S. Mail and facsimile to (717) 534-7549 Richard H. Lenny Chairman, President and Chief Executive Officer Hershey Company 100 Crystal A Drive Hershey, PA 17033

Re: Hershey Company
Definitive Proxy Statement on Schedule 14A
Filed March 16, 2007
File No. 001-00183

Dear Mr. Lenny:

We have completed our review of your executive compensation and related disclosure, and we have no further comments at this time.

Please note that the company is responsible for the adequacy and accuracy of the disclosure in its filing. We are not approving any proposed disclosure you may have included in your response letter or any disclosure you include in your future filings in response to our comments.

If you have any further questions regarding our review of your filing, please call me at (202) 551-3687.

Sincerely,

Carmen Moncada-Terry Attorney Advisor