



DIVISION OF  
CORPORATION FINANCE

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

May 12, 2025

Gary Millerchip  
Executive Vice President and Chief Financial Officer  
Costco Wholesale Corporation  
999 Lake Drive  
Issaquah, WA 98027

**Re: Costco Wholesale Corporation**  
**Form 10-K for Fiscal Year Ended September 1, 2024**  
**Response dated April 21, 2025**  
**File No. 000-20355**

Dear Gary Millerchip:

We have reviewed your April 21, 2025 response to our comment letter and have the following comment(s).

Please respond to this letter 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 a comment applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to this letter, we may have additional comments. Unless we note otherwise, any references to prior comments are to comments in our March 19, 2025 letter.

Form 10-K for the Fiscal Year Ended September 1, 2024

Business

Memberships, page 5

1. We note your response to prior comment 1 and 3. Please clarify your disclosure so users have better understanding of your rationale behind the methodology of your renewal rate calculation and active memberships.

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Please contact Patrick Kuhn at 202-551-3308 or Lyn Shenk at 202-551-3380 if you have questions regarding comments on the financial statements and related matters.

Sincerely,

Division of Corporation Finance  
Office of Trade & Services