



DIVISION OF  
CORPORATION FINANCE

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

September 20, 2018

Shui-Yi Kuo  
Chief Financial Officer  
Chunghwa Telecom Co., Ltd.  
21-3 Hsinyi Road, Section 1  
Taipei, Taiwan  
Republic of China

**Re: Chunghwa Telecom Co., Ltd.**  
**Form 20-F for the Fiscal Year Ended December 31, 2017**  
**Filed April 27, 2018**  
**File Number 001-31731**

Dear Mr. Kuo:

We have limited our review of your filing to the financial statements and related disclosures 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 the 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 applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to the comment, we may have additional comments.

Form 20-F for the Fiscal Year Ended December 31, 2017

Financial Statements

Note 3. Summary of Significant Accounting Policies

Basis of Consolidation, page F-11

1. Please explain to us in detail your basis under IFRS 10 for consolidating Senao International Co., Ltd. ("SENAO"). In this regard, we note your statement that Chunghwa remains in control over SENAO's relevant activities despite only holding four out of nine seats on the Board of Directors. Please explain these relevant activities and the existing rights that give Chunghwa the power to direct them. Tell us the extent that you are relying upon decision-making rights delegated to the Company from the large beneficial stockholders and explain the nature of these arrangements. Also, explain the facts and

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circumstances concerning the other investors in SENAIO and any relevant rights held by them.

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 Christie Wong, Senior Staff Accountant, at 202-551-3684 or Robert Littlepage, Accountant Branch Chief, at 202-551-3361 if you have any questions.

Sincerely,

Division of Corporation Finance  
Office of Telecommunications