

Mail Stop 3561

July 6, 2006

BY U.S. Mail and Facsimile [ 852-2688-0394 ]

Mr. James Blake  
Chief Executive Officer  
KOWLOON-CANTON RAILWAY CORPORATION  
KCRC House, 9 Lok King Street  
Fo Tan, Sha Tin  
New Territories, Hong Kong

**Re: Kowloon-Canton Railway Corporation  
Form 20-F for Fiscal Year Ended December 31, 2004  
File No. 1-15004**

Dear Mr. Blake:

We have completed our review of your Form 20-F and have no further comments at this time.

Sincerely,

David R. Humphrey  
Accounting Branch Chief