



DIVISION OF
CORPORATION FINANCE

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

February 18, 2011

Mr. Chang Xiaobing
Chairman and Chief Executive Officer
China Unicom (Hong Kong) Limited
75th Floor, The Center
90 Queen's Road Central
Hong Kong

Re: China Unicom (Hong Kong) Limited
Form 20-F for the fiscal year ended December 31, 2009
Filed June 18, 2010
File No. 1-15028

Dear Mr. Chang:

We have completed our review of your Form 20-F and related filings and do not, at this time, have any further comments.

Sincerely,

/s/ Robert S. Littlepage
for

Larry Spigel
Assistant Director

cc: Ms. Chun Wei
Sullivan & Cromwell LLP
Via Facsimile: 852-2522-2280