



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4628

December 5, 2017

Via E-Mail

Gao Yonggang  
Chief Financial Officer  
Semiconductor Manufacturing International Corp.  
18 Zhangjiang Road  
Pudong New Area  
Shanghai  
China, 201203

**Re: Semiconductor Manufacturing International Corp.  
Form 20-F for the Fiscal Year Ended December 31, 2016  
Filed April 27, 2017  
File No. 1-31994**

Dear Mr. Yonggang:

We refer you to our comment letter dated November 6, 2017 regarding potential business contacts with Syria and Sudan. We have completed our review of this subject matter. 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.

Sincerely,

/s/ Cecilia Blye

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Amanda Ravitz  
Assistant Director