

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

CORPORATION FINANCE

Mail Stop 3561

August 3, 2016

Jose Montero Chief Financial Officer Copa Holdings, S.A. Avenida Principal y Avenida de la Rotonda, Costa del Este Complejo Business Park, Torre Norte Parque Lefevre, Panama City, Panama

Re: Copa Holdings, S.A.

Form 20-F

Filed May 2, 2016 File No. 001-32696

Dear Mr. Montero:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Andrew Mew

Andrew Mew Senior Assistant Chief Accountant Office of Transportation and Leisure