

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

DIVISION OF CORPORATION FINANCE

October 1, 2019

<u>Via Email</u> Toshizo Tanaka Executive Vice President and Chief Financial Officer Canon Inc. 30-2, Shimomaruko 3-chome Tokyo 146-8501 Japan

> Re: Canon Inc. Form 20-F for the Fiscal Year Ended December 31, 2018 Filed March 28, 2019 File No. 1-15122

Dear Mr. Tanaka:

We refer you to our comment letter dated August 30, 2019, regarding 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: Jon Gray, Esq. Davis Polk & Wardwell LLP