



DIVISION OF  
CORPORATION FINANCE

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

April 3, 2019

Yu Huang  
Chief Executive Officer  
China Index Holdings Limited  
Tower A, No. 20 Guogongzhuang Middle Street  
Fengtai District  
Beijing 100070, People's Republic of China

**Re: China Index Holdings Limited**  
**Amendment No. 2 to**  
**Draft Registration Statement on Form F-1**  
**Submitted March 8, 2019**  
**CIK No. 0001749797**

Dear Ms. Huang:

We have reviewed your amended draft registration statement and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by providing the requested information and either submitting an amended draft registration statement or publicly filing your registration statement on EDGAR. If you do not believe our comments apply to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing the information you provide in response to these comments and your amended draft registration statement or filed registration statement, we may have additional comments.

Amendment No. 2 to Draft Registration Statement on Form F-1

Governing Law and Consent to Jurisdiction, page 180

1. We note that your forum selection provision under the deposit agreement identifies state or federal court in New York, New York for certain litigation. Please disclose whether this provision applies to actions arising under the Securities Act or Exchange Act.

Index to Combined Financial Statements, page F-1

2. Please revise to include updated audited financial statements in accordance with Item 8.A.4 of Form 20-F.

Yu Huang  
China Index Holdings Limited  
April 3, 2019  
Page 2

You may contact Melissa Walsh, Staff Accountant, at 202-551-3224 or Stephen Krikorian, Accounting Branch Chief, at 202-551-3488 if you have questions regarding comments on the financial statements and related matters. Please contact Donald Field, Attorney-Advisor, at 202-551-3680 or Justin Dobbie, Legal Branch Chief, at 202-551-3469 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Information Technologies  
and Services