



DIVISION OF  
CORPORATION FINANCE

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

November 18, 2021

William Fung  
Chief Executive Officer  
AMTD International Inc.  
23/F Nexxus Building  
41 Connaught Road Central  
Hong Kong

**Re: AMTD International Inc.**  
**Form 20-F for the fiscal year ended Decemer 31, 2020**  
**Filed on April 28, 2021**  
**File No. 001-39006**

Dear Mr. Fung:

We have reviewed your October 19, 2021 response to our comment letter and have the following comment. In our comment, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this comment within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comment applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to this comment, we may have additional comments.

Form 20-F for the fiscal year ended December 31, 2020

Item 3D. Risk Factors

Risks Relating to Our Business and Industry

Our ADSs may be delisted under the Holding Foreign Companies Accountable Act if the PCAOB is unable to inspect..., page 19

1. Please expand your risk factor disclosure to discuss that the United States Senate passed the Accelerating Holding Foreign Companies Accountable Act, which, if enacted, would decrease the number of non-inspection years from three years to two, thus reducing the time period before your securities may be prohibited from trading or delisted.

William Fung  
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You may contact Bonnie Baynes at (202) 551-4924 or Sharon Blume at (202) 551-3474 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Finance