



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4628

March 30, 2016

Via E-Mail

George S. Davis  
Executive Vice President and Chief Financial Officer  
Qualcomm Inc.  
5575 Morehouse Drive  
San Diego, CA 92121

**Re: Qualcomm Inc.  
Form 10-K for the Fiscal Year Ended September 27, 2015  
Filed November 4, 2015  
File No. 0-19528**

Dear Mr. Davis:

We refer you to our comment letter dated March 1, 2016 regarding business contacts with Syria and Sudan. We have completed our review of this subject matter. 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/ Cecilia Blye

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Larry Spigel  
Assistant Director  
Division of Corporation Finance