



DIVISION OF
CORPORATION FINANCE

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

Mail Stop 3720

October 18, 2007

Via U. S. Mail and Fax (011 34 91 584 8949)

Mr. Santiago Fernandez Valbuena
Chief Executive Officer
Telefonica, S.A.
Gran Via, 28
28013 Madrid, Spain

Re: Telefonica, S.A.
Form 20-F for the fiscal year ended December 31, 2006
Filed May 18, 2007
File No. 001-09531

Dear Mr. Valbuena:

We have completed our review of the above filing, and do not, at this time, have any further comments.

Sincerely,

Larry Spigel
Assistant Director