



DIVISION OF  
CORPORATION FINANCE

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

September 23, 2010

Mr. Luis Pacheco de Melo  
Chief Financial Officer  
Portugal Telecom, SGPS, S.A.  
Av. Fontes Pereira de Melo, 40  
1069-300 Lisboa  
Portugal

**Re: Portugal Telecom, SGPS, S.A.  
Form 20-F for the fiscal year ended December 31, 2009  
Filed April 16, 2010  
File No. 001-13758**

Dear Mr. Luis Pacheco de Melo:

We have completed our review of your Form 20-F and related filings and do not, at this time, have any further comments.

Sincerely,

Larry Spiregel  
Assistant Director