



Santiago, 17 September 2008

U.S. Securities and Exchange Commission
100 F. Street, N.E.
Washington, D.C. 20549
United States of America

Office of Mergers and Acquisitions

Division of Corporation Finance
Attention: Michele Anderson, Chief
Christina Chalk

Re: **Compañía de Telecomunicaciones de Chile S.A.**

Dear Ms. Anderson and Ms. Chalk:

We refer the letter dated September 17, 2008 (the "**Letter**") from Stephen G. Rooney of the firm Dewey & Le Boeuf LLP, writing to you on behalf of our client Inversiones Telefónica Internacional Holding Ltda, a limited liability company organized under the laws of Chile (the "**Offeror**"). In the Letter the Offeror respectfully requested that the staff (the "**Staff**") of the U.S. Securities and Exchange Commission (the "**Commission**") grant certain no-action and exemptive relief in connection with the proposed offer (the "**Offer**") by the Offeror for all of the outstanding shares (the "**Shares**") of Compañía de Telecomunicaciones de Chile S.A. ("**CTC**"), including shares represented by CTC American Depositary Shares ("**ADSs**").

This letter is rendered solely for the benefit of the addressee in connection with the Letter and may not be used or relied upon by any other person for any other purpose. This Letter is limited to matters of Chilean law and practice as set out therein. This letter is provided incidentally to, and in the ordinary course of our practice of Chilean law in Chile and does not purport to cover any aspects of U.S. law and without prejudice to our status as a "non-appearing foreign attorney" for purposes of the Commission's rules and practice.

We hereby acknowledge that we have been and are Chilean counsel to the Offeror in connection with the Offer. We have reviewed the Letter and we believe the description of the Chilean offer rules applicable to the Offer and the Chilean offer practice contained therein are accurate and fairly summarizes for the purpose of the Letter all the relevant provisions of Chilean law and practice applicable to the Offer.

We have relied Dewey & Le Boeuf LLP in matters of U.S. law and practice in connection with the purposes of the Letter.





If we can be of any further assistance or if you have any further questions, please do not hesitate to contact the undersigned.

Yours faithfully

Jorge Delpiano
Guerrero, Olivos Novoa y Errázuriz Ltda.