

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

DIVISION OF CORPORATION FINANCE

Mail Stop 4628

September 3, 2015

<u>Via E-mail</u> Young-Joon Kim Chief Executive Officer MagnaChip Semiconductor Corporation c/o MagnaChip Semiconductor S.A. 1, Allée Scheffer, L-2520 Luxembourg, Grand Duchy of Luxembourg

> Re: MagnaChip Semiconductor Corporation Form 10-K for Fiscal Year Ended December 31, 2014 Filed May 28, 2015 File No. 1-34791

Dear Mr.Kim:

We refer you to our comment letter dated August 7, 2015, regarding business contacts with Sudan and Syria. 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: Amanda Ravitz Assistant Director Division of Corporation Finance Young-Soon Kim MagnaChip Semiconductor Corporation September 3, 2015 Page 2

> Theodore S. Kim Chief Compliance Officer, Executive Vice President, General Counsel and Secretary MagnaChip Semiconductor Corporation

W. Stuart Ogg Partner Jones Day