

MAGNACHIP SEMICONDUCTOR S.A.  
MAGNACHIP SEMICONDUCTOR FINANCE COMPANY  
c/o MagnaChip Semiconductor S.A.  
74, rue de Merl  
B.P. 709 L-2146 Luxembourg R.C.S.  
Luxembourg, B97483

**VIA EDGAR AND FACSIMILE**

October 15, 2010

Division of Corporation Finance  
Mail Stop 3561  
United States Securities and Exchange Commission  
100 F Street, N.E.,  
Washington, D.C. 20549

Attention: Tim Buchmiller, Senior Attorney

**Re: Acceleration Request of MagnaChip Semiconductor S.A. (the “Company”) and MagnaChip Semiconductor Finance Company (the “Co-Issuer”, and together with the Company, the “Issuers”) and the Guarantors ( as defined below)  
Registration Statement of Form S-1 (File No. 333-168790)**

Ladies and Gentlemen:

Pursuant to Rule 461 of the Rules and Regulations of the Securities and Exchange Commission (the “Commission”) under the Securities Act of 1933, as amended (the “Securities Act”), the undersigned hereby request that the effective date of the above-referenced Registration Statement be accelerated so that the Registration Statement, as then amended, will become effective under the Securities Act by 4:00 p.m. (Eastern Time) on Friday, October 15, 2010, or as soon thereafter as practicable.

The disclosure in the Registration Statement is the responsibility of the Issuers and the guarantors, listed on the Table of Additional Registrants in the Registration Statement (the “Guarantors”). Each of the Issuers and the Guarantors acknowledge that staff comments or changes in response to staff comments in the disclosure in the Registration Statement may not be asserted as a defense in any proceeding which may be brought by any person with respect to this matter. Each of the Issuers and the Guarantors also represent to the Commission that should the Commission or the staff acting pursuant to delegated authority, declare the Registration Statement effective, it does not foreclose the Commission from taking any action with respect to the Registration Statement and each of the Issuers and the Guarantors represent that they will not assert this action as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

Each of the Issuers and the Guarantors further acknowledge that the action of the Commission or the staff, acting pursuant to delegated authority, in declaring the Registration Statement effective does not relieve the Issuers and the Guarantors from their full responsibility for the adequacy and accuracy of the disclosure in the Registration Statement.

Very truly yours,

**MAGNACHIP SEMICONDUCTOR S.A.**

By: /s/ John McFarland  
Name: John McFarland  
Title: Director

**MAGNACHIP SEMICONDUCTOR LLC**

By: /s/ Margaret Sakai  
Name: Margaret Sakai  
Title: Chief Financial Officer

**MAGNACHIP SEMICONDUCTOR B.V.**

By: /s/ John McFarland  
Name: John McFarland  
Title: Authorized Representative

**MAGNACHIP SEMICONDUCTOR LTD (UNITED KINGDOM)**

By: /s/ John McFarland  
Name: John McFarland  
Title: Company Secretary

By: /s/ Brent Rowe  
Name: Brent Rowe  
Title: Director

**MAGNACHIP SEMICONDUCTOR LTD (TAIWAN)**

By: /s/ Margaret Sakai  
Name: Margaret Sakai  
Title: Director

**MAGNACHIP SEMICONDUCTOR HOLDING COMPANY LIMITED**

By: /s/ Margaret Sakai  
Name: Margaret Sakai  
Title: Chief Financial Officer

**MAGNACHIP SEMICONDUCTOR FINANCE COMPANY**

By: /s/ Margaret Sakai  
Name: Margaret Sakai  
Title: Chief Financial Officer

**MAGNACHIP SEMICONDUCTOR SA HOLDINGS LLC**

By: /s/ Margaret Sakai  
Name: Margaret Sakai  
Title: Chief Financial Officer

**MAGNACHIP SEMICONDUCTOR, INC. (USA)**

By: /s/ Margaret Sakai  
Name: Margaret Sakai  
Title: Chief Financial Officer

**MAGNACHIP SEMICONDUCTOR LTD (HONG KONG)**

By: /s/ Margaret Sakai  
Name: Margaret Sakai  
Title: Director

**MAGNACHIP SEMICONDUCTOR INC. (JAPAN)**

By: /s/ Margaret Sakai  
Name: Margaret Sakai  
Title: Director

*Signature Page to S-1 Acceleration Request Letter*

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cc: Micheal Reagan  
Stuart Ogg