

**Studio City International Holdings Limited**  
**6th Floor, The Centrium**  
**60 Wyndham Street**  
**Central, Hong Kong**

September 25, 2020

**VIA EDGAR**

Office of Real Estate & Construction  
Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549

Attention: Ronald Alper

**Re: Studio City International Holdings  
Limited Registration Statement on Form  
F-3 File No. 333-248804**

Ladies and Gentlemen:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, Studio City International Holdings Limited (the "Company") hereby requests acceleration of the effective date of the above referenced Registration Statement to 4:00 p.m., Eastern Time, on September 29, 2020, or as soon thereafter as practicable, or at such other time as the Company or its outside counsel, Kirkland & Ellis LLP, request by telephone that such Registration Statement be declared effective.

The Company hereby acknowledges its responsibilities under the Securities Act of 1933, as amended, and the Securities Exchange Act of 1934, as amended, as they relate to the proposed public offering of the securities specified in the above-referenced Registration Statement. In connection with the foregoing request for acceleration of effectiveness, the Company hereby further acknowledges that:

- should the Securities and Exchange Commission (the "Commission") or the staff, acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;
- the action of the Commission or the staff, acting pursuant to delegated authority, in declaring the filing effective, does not relieve the Company from its full responsibility for the adequacy and accuracy of the disclosure in the filing; and
- the Company may not assert staff comments or the declaration of effectiveness as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

Please contact Tim Cruickshank, of Kirkland & Ellis LLP, special counsel to the Company, at (212) 446-4794, as soon as the registration statement has been declared effective, or if you have any other questions or concerns regarding this matter.

Sincerely,

/s/ Tim Y. Sung

Tim Y. Sung

Company Secretary