



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4720

September 12, 2017

Danilo M. Rapadas  
Senior Vice President, General Counsel &  
Chief Risk Officer  
BankGuam Holding Company  
111 W Chalan Santo Papa  
Hagåtña, Guam 96910

**Re: BankGuam Holding Company  
Registration Statement on Form S-1  
Filed September 6, 2017  
File No. 333-220357**

Dear Mr. Rapadas:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Christopher Dunham, Staff Attorney, at (202) 551-3783 with any questions.

Sincerely,

/s/ Era Anagnosti

Era Anagnosti  
Legal Branch Chief  
Office of Financial Services

cc: Stephen C. Hinton, Esq.