



DIVISION OF  
CORPORATION FINANCE

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

October 4, 2018

Mauricio Ramos  
President and Chief Executive Officer  
Millicom International Cellular S.A.  
2, Rue du Fort Bourbon  
L-1249 Luxembourg  
Grand Duchy of Luxembourg

**Re: Millicom International Cellular S.A.  
Amendment No. 1 to  
Draft Registration Statement on Form 20-F  
Submitted September 28, 2018  
CIK No. 0000912958**

Dear Mr. Ramos:

We have reviewed your amended draft registration statement and have the following comment. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by providing the requested information and either submitting an amended draft registration statement or publicly filing your registration statement on EDGAR. If you do not believe our comment applies to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing the information you provide in response to this comment and your amended draft registration statement or filed registration statement, we may have additional comments.

Draft Registration Statement on Form 20-F

Financial Statements

2. Summary of Consolidation and Accountintg Policies

The revenue recognition accounting policy applied from January 1, 2018 ...

Principal-Agent, page F-10

1. We note your response to comment 10. Please disclose the nature of the promised goods or services where the Group has determined it is acting as a principle and where it is

Mauricio Ramos  
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acting as an agent. Please refer to paragraph 119(c) of IFRS 15.

You may contact Joseph M. Kempf, Senior Staff Accountant, at (202) 551-3352 or Robert S. Littlepage, Accountant Branch Chief, at (202) 551-3361 if you have questions regarding comments on the financial statements and related matters. Please contact Joshua Shainess, Attorney Advisor, at (202) 551-7951 or Celeste M. Murphy, Legal Branch Chief, at (202) 551-3257 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Telecommunications