



DIVISION OF  
CORPORATION FINANCE

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

September 25, 2020

Brian Coleman  
Chief Financial Officer  
Clear Channel Outdoor Holdings, Inc.  
4830 North Loop 1604 West, Suite 111  
San Antonio, TX 78249

**Re: Clear Channel Outdoor Holdings, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2019**  
**Filed February 27, 2020**  
**File No. 001-32663**

Dear Mr. Coleman:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance  
Office of Trade & Services