

December 31, 2019

Jose Montero  
Chief Financial Officer  
Copa Holdings, S.A.  
Avenida Principal y Avenida de la Rotonda, Costa del Este  
Complejo Business Park, Torre Norte  
Panama City, Panama

Re: Copa Holdings, S.A.  
Form 20-F for the Fiscal Year ended December 31, 2018  
Filed April 24, 2019  
File No. 001-32696

Dear Mr. Montero:

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

Office of Energy &

Corporation Finance  
Transportation