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# SECURITIES AND EXCHANGE COMMISSION

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2 September 2013 Ref.: OP-LFS-125-2013L

#### SECURITIES AND EXCHANGE COMMISSION

SEC Bldg., EDSA, Greenhills Mandaluyong City

> Attention: Atty. Justina F. Callangan Director, Corporation Finance Department

> > Re: Letter dated 25 July 2013

We write in connection with your letter dated 25 July 2013 ("Letter"), a copy of which was received by Philippine National Construction Corp. ("PNCC") on 28 August 2013.

PNCC was advised that its 2013 First Quarter Report ("SEC Form 17-Q"), filed on 4 July 2013, does not fully comply with the disclosure requirements under SRC Rule 17.1(1)(A)(ii).

PNCC was directed to submit an amended SEC Form 17-Q supplying the deficiencies in the checklist attached to the Letter, and explain why the required information was not reflected in the original filing.

We note that the figures as of 31 December 2013 are already audited. We. however, failed to indicate such in the SEC Form 17-Q through oversight. Please note also that the SEC Form 17-Q already contains in Section 2.1 a schedule showing financial soundness indicators in two comparative periods, but is presented in a different format.

As instructed by the SEC, we submit herewith PNCC's Amended First Quarter SEC Form 17-Q, which complies with the disclosure requirements.

Very truly yours,

LUIS F. SISON

President/CEO