longer subject to Section 16. Form 4 or Form 5 obligations may continue. See Instruction 1(b).

UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

OMB APPROVAL OMB Number: 3235-0287 Estimated average burden hours per response... 0.5

STATEMENT OF CHANGES IN BENEFICIAL OWNERSHIP OF SECURITIES

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934 or Section 30(h) of the Investment Company Act of 1940

	e Responses																		
1. Name and Address of Reporting Person* SULLIVAN DANIEL L						2. Issuer Name and Ticker or Trading Symbol QUALCOMM INC/DE [QCOM]								5. Relationship of Reporting Person(s) to Issuer (Check all applicable) Director X Officer (give title below) Other (specify below) Executive VP, Human Resources					
(Last) (First) (Middle) 5775 MOREHOUSE DR.						3. Date of Earliest Transaction (Month/Day/Year) 12/03/2004													
(Street)						4. If Amendment, Date Original Filed(Month/Day/Year)								6. Individual or Joint/Group Filing(Check Applicable Line) Form filed by One Reporting Person Form filed by More than One Reporting Person					
SAN DIEGO, CA 92121-1714																			
(City) (State) (Zip)					Table I - Non-Derivative Securities Acq								ired, D	isposed o	f, or Benefi	icially Owned			
(Instr. 3) Date			2. Transaction Date (Month/Day/Yea	ear) 2A. Deemed Execution Date any (Month/Day/Y		Date, if	(Instr. 8		(A	Securities Acqual or Disposed on Str. 3, 4 and 5)	of (D)	(D) Owned Transac		amount of Securities Beneficially ned Following Reported nsaction(s) tr. 3 and 4)		Ownership orm: Oirect (D)	7. Nature of Indirect Beneficial Ownership		
								Coo	de	V A	mount (A) or (D)	Price			(or Indirect (I) (Instr. 4)	(Instr. 4)		
Reminder: I	Report on a se	enarate line fo	r each cl	ass of securities b	eneficial	ly o	wned dire										,		
Reminder, 1	eport on a sc	cparate fine to	r cacii ci	ass of securities o	chericiai	Iy O	whed direc	ctry or	Pe in	ersons this f	who respon orm are not re ntly valid OME	equired	l to re	spond u				1474 (9-02)	
				Table II							sed of, or Bene		Owned	l					
1. Title of Derivative Security (Instr. 3)	2. Conversion or Exercise Price of Derivative Security				4. 5. Num Transaction Derivation Code Securiti			ber of ive Expiration (Month/Da osed of		ite Exe ration I	rcisable and Date	7. Title and A of Underlying Securities (Instr. 3 and 4		;	8. Price of Derivative Security (Instr. 5)	9. Number of Derivative Securities Beneficially Owned Following Reported Transaction(s)	10. Ownershi Form of Derivativ Security: Direct (D or Indirect (I)	Benefici Ownersh (Instr. 4)	
					Code	V	(A)	(D)		cisable	Expiration Date	Title	c N	Amount or Number of Shares		(Instr. 4)	(Instr. 4)		
Non- Qualified Stock Option (right to buy)	\$ 43.62	2 12/03/2004			A		250,00	0		(1)	12/02/2014	Comm	. 4	250,000	\$ 0	250,000	D		
Repor	ting O	wners																	
					Rela	atio	nships												
Reporting Owner Name / Address Direct			Directo	or 10% Owner	Officer						Other	Other							
SULLIVAN DANIEL L 5775 MOREHOUSE DR. SAN DIEGO, CA 92121-1714					Executive VP, Human Resources														
Signat	ures										_								

Explanation of Responses:

If the form is filed by more than one reporting person, see Instruction 4(b)(v).

By: Noreen E. Burns, Attorney-in-Fact For: Daniel L. Sullivan

Signature of Reporting Person

- ** Intentional misstatements or omissions of facts constitute Federal Criminal Violations. See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).
- The options vest 10% on the six month anniversary of the date of grant and the remaining balance vests monthly thereafter. The option is fully vested five years after the date of

12/07/2004 Date

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, see Instruction 6 for procedure.

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB number.	