

October 16, 2023

Handong Cheng  
Chief Executive Officer  
ZW Data Action Technologies Inc.  
Room 1811, Xinghuo Keji Plaza, No. 2 Fufeng Road  
Fengtai District, Beijing, PRC

Technologies Inc.

Fiscal Year Ended December 31, 2022

Re: ZW Data Action

Form 10-K for the

File No. 001-34647

Dear Handong Cheng:

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

Disclosure Review Program

cc:

Vivien Bai