

**ZW Data Action Technologies Inc.  
Room 1811, Xinghuo Keji Plaza,  
No. 2 Fufeng Road, Fengtai District, Beijing, PRC 100070**

January 24, 2024

VIA EDGAR

Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, DC 20549

**RE: ZW Data Action Technologies Inc. (the “Company”)  
Registration Statement on Form S-3  
File No. 333-276448**

---

Ladies and Gentlemen:

In accordance with Rule 461 under the Securities Act of 1933, as amended, the undersigned respectfully requests that the effective date of the above-referenced Registration Statement be accelerated so that the same will become effective at 9:00AM on Monday, January 29, 2024, or as soon thereafter as is practicable.

Please advise the undersigned at +86 10 6084 6616 or via email at [chenghandong@chinanet-online.com](mailto:chenghandong@chinanet-online.com) when the order permitting such Registration Statement to become effective is issued.

*[signature page follows]*

---

Very truly yours,

**ZW Data Action Technologies Inc.**

By: /s/Handong Cheng

Name: Handong Cheng

Title: Chief Executive Officer

cc: Lawrence Venick, Esq., Loeb & Loeb LLP (telephone (86) 10 5954 3688)  
Vivien Bai, Esq., Loeb & Loeb LLP (telephone (212) 407 4933)