



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

October 10, 2019

Tim Ti  
Chief Executive Officer  
UTStarcom Holdings Corp.  
Level 6, 28 Hennessy Road,  
Admiralty, Hong Kong

**Re: UTStarcom Holdings Corp.**  
**Form 20-F for the Year Ended December 31, 2018**  
**Filed April 17, 2019**  
**File No. 001-35216**

Dear Mr. Ti:

We issued a comment to you on the above captioned filing on September 19, 2019. As of the date of this letter, this comment remains outstanding and unresolved. We expect you to provide a complete, substantive response to this comment by October 25, 2019.

If you do not respond, we will, consistent with our obligations under the federal securities laws, decide how we will seek to resolve the material outstanding comment and complete our review of your filing and your disclosure. Among other things, we may decide to release publicly, through the agency's EDGAR system, all correspondence, including this letter, relating to the review of your filings, consistent with the staff's decision to publicly release comment and response letters relating to disclosure filings it has reviewed.

Please contact Robert Shapiro, Senior Staff Accountant, at (202) 551-3273 or Robert S. Littlepage, Accounting Branch Chief, at (202) 551-3361 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Technology