



DIVISION OF
CORPORATION FINANCE

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

November 5, 2012

Via E-mail

Shudong Xia

Chairman, President, Chief Executive Officer and Secretary

China TransInfo Technology Corp.

9th Floor, Vision Building

No. 39 Xueyuanlu, Haidian District

Beijing, China 100191

Re: China TransInfo Technology Corp.

Schedule 13E-3

**Filed June 26, 2012 by China TransInfo Technology Corp., TransCloud
Company Limited, TransCloud Acquisition Inc., Shudong
Investments Limited, Karmen Investment Holdings Limited, SAIF
Partners III, L.P., SAIF Partners IV, L.P., Shudong Xia, Danxia
Huang, and Shufeng Xia**

File No. 005-79105

Preliminary Proxy Statement on Schedule 14A

Filed June 26, 2012

File No. 001-34134

Dear Mr. Xia:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Maryse Mills-Apenteng

Maryse Mills-Apenteng
Special Counsel

cc: Via E-mail

Lee Edwards, Esq.

Shearman & Sterling LLP