



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3720

February 6, 2017

Peter Hovenier  
Chief Financial Officer  
Boingo Wireless, Inc.  
10960 Wilshire Blvd., 23<sup>rd</sup> Floor  
Los Angeles, California 90024

**Re: Boingo Wireless, Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2015**  
**Filed March 11, 2016**  
**File No. 001-35155**

Dear Mr. Hovenier:

We have completed our review of your filings. 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,

/s/ Carlos Pacho for

Larry Spigel  
Assistant Director  
AD Office 11 – Telecommunications