



DIVISION OF  
CORPORATION FINANCE

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

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

**Re: ZW Data Action Technologies Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2022**  
**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