



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 3720

December 4, 2009

Via U.S. Mail and facsimile to (978) 640-6825

Mr. Ashraf M. Dahod  
President and Chief Executive Officer  
Starent Networks, Corp.  
30 International Place  
Tewksbury, MA 01876

**Re: Starent Networks, Corp.**  
**Form 10-K for the fiscal year ended December 31, 2008**  
**Filed February 27, 2009**  
**File No. 001-33511**

Dear Mr. Dahod:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

/s/ Paul Fischer for  
Larry Spiegel  
Assistant Director