

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

DIVISION OF CORPORATION FINANCE

Mail Stop 3561

December 22, 2017

Lei Cao Chief Executive Officer Sino-Global Shipping America, Ltd. 1044 Northern Boulevard, Suite 305 Roslyn, NY 11576-1514

> Re: Sino-Global Shipping America, Ltd. Registration Statement on Form S-3 Filed December 15, 2017 File No. 333-222098

Dear Mr. Cao:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact John Stickel at 202-551-3324 or me at 202-551-3469 with any questions.

Sincerely,

/s/ Justin Dobbie

Justin Dobbie Legal Branch Chief Office of Transportation and Leisure