

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

November 30, 2023

Huiping Yan Chief Financial Officer ZTO Express (Cayman) Inc. Building One, No. 1685 Huazhi Road Qingpu District, Shanghai, 201708 People's Republic of China

Re: ZTO Express (Cayman) Inc.

Form 20-F for the Fiscal Year ended December 31, 2022

Filed April 20, 2023 File No. 001-37922

Dear Huiping Yan:

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 Office of Energy & Transportation