



DIVISION OF  
CORPORATION FINANCE

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

November 20, 2019

Antony Leung  
Chairman  
New Frontier Corp  
23rd Floor, 299 QRC  
287-299 Queen's Road Central  
Hong Kong

**Re: New Frontier Corp**  
**Preliminary Proxy Materials on Schedule PreR14A**  
**Filed on November 12, 2019**  
**File no. 001-38562**

Dear Mr. Leung:

We have reviewed your filing and have the following comment. Please respond to this comment within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comment applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to this comment, we may have additional comments.

Preliminary Proxy Materials on Schedule PRER14A filed on November 12, 2019

Index to Consolidated Financial Information, page F-1

1. Please update to include New Frontier Corp's most recent interim financial statements filed in the Form 10-Q for the quarter ended September 30, 2019. Similarly, please also update the related disclosures including MD&A and the pro forma information.

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.

You may contact Kathryn Jacobson, Staff Accountant, at 202-551-3365, or Robert S. Littlepage, Accounting Branch Chief, at 202-551-3361, if you have questions regarding comments on the financial statements and related matters. Please contact Paul Fischer, Staff

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Attorney, at 202-551-3415, or Celeste M. Murphy, Legal Branch Chief, at 202-551-3257, with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Real Estate & Construction

cc: Jonathan Rochwarger, Esq.