

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

April 26, 2019

David Wagner Chief Executive Officer ZIX CORPORATION 2711 North Haskell Avenue Suite 2200, LB 36 Dallas, TX 75204

Re: ZIX CORPORATION

Preliminary Proxy Statement on Schedule 14A Filed March 29, 2019 File no. 000-17995

Dear Mr. Wagner:

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 Information Technologies and Services