



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3720

October 31, 2017

Thomas R. Stanton  
Chief Executive Officer and  
Chairman of the Board  
ADTRAN, Inc.  
901 Explorer Drive  
Huntsville, AL 35806-2807

**Re: ADTRAN, Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2016**  
**Filed February 24, 2017**  
**File No. 000-24612**

Dear Mr. Stanton:

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,

/s/ Robert S. Littlepage, for

Larry Spigel  
Assistant Director  
AD Office 11 – Telecommunications