



DIVISION OF  
CORPORATION FINANCE

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

April 27, 2020

James Moylan, Jr.  
Sr. Vice President, Finance and Chief Financial Officer  
CIENA CORP  
7035 Ridge Road  
Hanover, MD 21076

**Re: CIENA CORP**  
**Form 10-K for the Fiscal Year Ended November 2, 2019**  
**Filed on December 20, 2019**  
**File No. 1-36250**

Dear Mr. Moylan:

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 Manufacturing