

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
November 13, 2015**

**ORDER GRANTING CONFIDENTIAL TREATMENT
UNDER THE SECURITIES ACT OF 1933**

Xtera, Inc.

File No. 333-207288 - CF#32922

Xtera, Inc. submitted an application under Rule 406 requesting confidential treatment for information it excluded from the Exhibits to a Form S-1 registration statement filed on October 5, 2015.

Based on representations by Xtera, Inc. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibits will not be released to the public for the time periods specified:

| | |
|---------------|-------------------------|
| Exhibit 10.11 | through January 1, 2016 |
| Exhibit 10.12 | through August 28, 2018 |

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Brent J. Fields
Secretary