

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

January 25, 2023

Handong Cheng Chief Executive Officer ZW Data Action Technologies Inc. Room 1106, Xinghuo Keji Plaza No. 2 Fufeng Road Fengtai District, Beijing China 100070

> Re: ZW Data Action Technologies Inc. Form 10-K for the Fiscal Year Ended December 31, 2021

File No. 001-34647

Dear Handong Cheng:

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 Technology