



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

DIVISION OF  
CORPORATION FINANCE

March 11, 2025

Dan Shao  
Co-Chief Executive Officer  
AirNet Technology Inc.  
Suite 301  
No. 26 Dongzhimenwai Street  
Chaoyang District, Beijing 100027  
The People's Republic of China

**Re: AirNet Technology Inc.**  
**Form 20-F for the Fiscal Year Ended December 31, 2023**  
**File No. 001-33765**

Dear Dan Shao:

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 Trade & Services

cc: Ronnie Li, Wilson Sonsini Goodrich & Rosati