

XUNLEI LIMITED  
3709 Baishi Road  
Nanshan District, Shenzhen 518000  
The People's Republic of China

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January 21, 2025

**VIA EDGAR**

Ms. Christine Dietz  
Ms. Chen Chen  
Division of Corporation Finance  
Office of Technology  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549

**Re: Xunlei Limited (the "Company")  
Form 20-F for the fiscal year ended December 31, 2023  
Response dated September 6, 2024  
File No. 001-35224**

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Dear Ms. Dietz and Ms. Chen,

The Company has received the letter dated December 10, 2024 (the "**Letter**") from the staff (the "**Staff**") of the Securities and Exchange Commission (the "**Commission**") regarding the Company's annual report on Form 20-F for the fiscal year ended December 31, 2023 filed with the Commission on April 23, 2024 (the "**2023 Form 20-F**") and the Company's correspondence filed with the Commission on September 6, 2024. The Company has previously submitted a letter on December 18, 2024 to the Staff to request an extension to the deadline for responding to the Letter to January 9, 2025. Subsequently, the Company has submitted a letter on January 6, 2025 to the Staff to request a further extension to the deadline for responding to the Letter to January 23, 2025.

The Company respectfully requests an additional extension of the deadline for responding to the Letter due to the additional time required to gather sufficient information and prepare thorough responses and the upcoming Chinese New Year holiday. The Company will provide its response to the Letter as soon as possible prior, no later than February 28, 2025.

If you have any additional questions or comments regarding the 2023 Form 20-F, please contact the undersigned at zhounaijiang@xunlei.com or the Company's U.S. counsel, Haiping Li of Skadden, Arps, Slate, Meagher & Flom LLP, at +86 21 6193 8210 or haiping.li@skadden.com.

Very truly yours,

**Xunlei Limited**

By: /s/ Naijiang (Eric) Zhou  
Name: Naijiang (Eric) Zhou  
Title: Chief Financial Officer

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cc: Jinbo Li, Chairman of the Board and Chief Executive Officer, Xunlei Limited  
Haiping Li, Esq., Partner, Skadden, Arps, Slate, Meagher & Flom LLP

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