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Z. JULIE GAO (CALIFORNIA)

October 28, 2021

**VIA EDGAR**

Mr. Austin Pattan  
Ms. Jan Woo  
Division of Corporation Finance  
Office of Technology  
U.S. Securities and Exchange Commission  
100 F Street, NE  
Washington, D.C. 20549

**Re: U CLOUDLINK GROUP INC. (CIK No. 0001775898)**  
**Responses to the Staff's Comments on the Amendment No. 3 to**  
**Registration Statement on Form F-3 Filed on October 18, 2021**

Dear Mr. Pattan and Ms. Woo:

On behalf of our client, U CLOUDLINK GROUP INC., a foreign private issuer organized under the laws of the Cayman Islands (the "**Company**"), we submit to the staff (the "**Staff**") of the Securities and Exchange Commission (the "**Commission**") this letter setting forth the Company's responses to the comments contained in the Staff's letter dated October 26, 2021 on the Company's amendment no. 3 to registration statement on Form F-3 filed on October 18, 2021 (the "**Registration Statement**").

Concurrently with the submission of this letter, the Company is filing amendment no. 4 to the Company's registration statement on Form F-3 (the "**Revised Registration Statement**") including certain exhibit thereto via EDGAR with the Commission for review.

The Staff's comments are repeated below in bold and are followed by the Company's responses. We have included page references in the Revised Registration Statement where the language addressing a particular comment appears. Capitalized terms used but not otherwise defined herein have the meanings set forth in the Revised Registration Statement.

**Comments in Letter Dated October 26, 2021**

**Prospectus Cover Page**

- 1. Please amend your cover page to provide a clear description of how cash is transferred through your organization and include cross references to a more detailed discussion.**

In response to the Staff's comment, the Company has revised the disclosure on the prospectus cover page of the Revised Registration Statement.

\* \* \*

If you have any questions regarding the Revised Registration Statement, please contact the undersigned by phone at +852 3740-4863 or via e-mail at julie.gao@skadden.com.

Very truly yours,

/s/ Z. Julie Gao

Z. Julie Gao

Enclosures.

cc: Chaohui Chen, Chief Executive Officer, U-CLOUDLINK GROUP INC.  
Zhiping Peng, Chairman of the Board of Directors, U-CLOUDLINK GROUP INC.  
Yimeng Shi, Chief Financial Officer, U-CLOUDLINK GROUP INC.  
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