

Ciena Corporation
7035 Ridge Road
Hanover, MD 21076

June 26, 2015

VIA EDGAR

Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: Ciena Corporation
Registration Statement on Form S-4 (File No. 333-204732)
Request for Acceleration of Effective Date

Ladies and Gentlemen:

Pursuant to Rule 461 of the General Rules and Regulations under the Securities Act of 1933, as amended, Ciena Corporation (the "Company") hereby requests that the Securities and Exchange Commission (the "Commission") accelerate the effective date of its Registration Statement on Form S-4 (File No. 333-204732), as amended, and declare the Registration Statement effective as of 5 p.m., Eastern Time, on June 29, 2015, or as soon thereafter as possible.

In connection with this request for acceleration, the Company acknowledges that:

- should the Commission or the staff, acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;
- the action of the Commission or the staff, acting pursuant to delegated authority, in declaring the filing effective, does not relieve the Company from its full responsibility for the adequacy and accuracy of the disclosure in the filing; and
- the Company may not assert staff comments and the declaration of effectiveness as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

Very truly yours,

Ciena Corporation

/s/ David M. Rothenstein

By: David M. Rothenstein

Title: Senior Vice President, General Counsel and Secretary