

February 28, 2006

Via U.S. Mail and Fax (410- 865-8901)
Mr. Joseph R. Chinnici
Senior Vice President and Chief Financial Officer
Ciena Corporation
1201 Winterson Road
Linthicum, MD 21090-2205

Re: Ciena Corporation
Form 10-K for Fiscal Year Ended October 31, 2005
Filed January 12, 2006

File No. 0-21969

Dear Mr. Chinnici:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

/s/ Kyle Moffatt for

Larry Spirgel
Assistant Director

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Mr. Robin N. Dickson
Harmonic Inc.
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UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
CORPORATION FINANCE