

**RIBBON COMMUNICATIONS INC.**  
6500 Chase Oaks Boulevard, Suite 100  
Plano, Texas 75023

May 18, 2023

**VIA EDGAR**

United States Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, NE  
Washington, D.C. 20549

**Re: Ribbon Communications Inc.  
Registration Statement on Form S-3  
Filed April 4, 2023  
File No. 333-271117**

Ladies and Gentlemen:

On behalf of Ribbon Communications Inc. (the "Company"), the undersigned hereby requests, pursuant to Rule 461 under the Securities Act of 1933, as amended, that the effective time of the Registration Statement on Form S-3 of the Company be 4:00 p.m., Eastern Time, on May 19, 2023, or as soon as practicable thereafter. The Company respectfully requests that you notify Patrick Macken by a telephone call to (978) 614-8170 of such effectiveness.

Please contact Betty Linkenauger Segaar of Troutman Pepper Hamilton Sanders LLP at (804) 697-2328 if you have any questions concerning this matter. Thank you for your continued attention to this matter.

Very truly yours,

**RIBBON COMMUNICATIONS INC.**

By: /s/ Patrick Macken  
Name: Patrick Macken  
Title: Executive Vice President, Chief Legal Officer  
and Corporate Secretary

cc: David W. Ghegan, Esq., Troutman Pepper Hamilton Sanders LLP  
Betty Linkenauger Segaar, Esq., Troutman Pepper Hamilton Sanders LLP

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