



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4628

June 21, 2019

Via E-Mail

Peter Hovenier  
Chief Financial Officer  
Boingo Wireless, Inc.  
10960 Wilshire Blvd., 23<sup>rd</sup> Floor  
Los Angeles, CA 90024

**Re: Boingo Wireless, Inc.  
Form 10-K for the Fiscal Year Ended December 31, 2018  
Filed March 1, 2019  
File No. 1-35155**

Dear Mr. Hovenier:

We refer you to our comment letter dated May 29, 2019 regarding business contacts with Syria, Sudan and North Korea. We have completed our review of this subject matter. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ Cecilia Blye

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Larry Spigel  
Assistant Director