

April 27, 2020

James Moylan, Jr.
Sr. Vice President, Finance and Chief Financial Officer
CIENA CORP
7035 Ridge Road
Hanover, MD 21076

Re: CIENA CORP
Form 10-K for the
Filed on December
File No. 1-36250

Fiscal Year Ended November 2, 2019
20, 2019

Dear Mr. Moylan:

We have completed our review of your filing. 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,

Division of Corporation Finance
Office of Manufacturing