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May 1, 2023

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

Re: NaaS Technology Inc. (CIK Number: 000 1712178) Registration Statement on Form F-1

Dear Sir/Madam,

On behalf of our client, NaaS Technology Inc., a foreign private issuer organized under the laws of the Cayman Islands (the "**Company**"), we are hereby filing a registration statement on Form F-1 (the "**Registration Statement**") relating to a proposed registered public offering in the United States of the Company's Class A ordinary shares, par value US\$0.01 per share, to be represented by American depositary shares ("**ADSs**") via EDGAR to the Securities and Exchange Commission (the "**Commission**").

The Company highly appreciates the prompt feedback from the staff of the Commission (the "**Staff**") on its Shell Company Report on Form 20-F and the amendments thereto. The Company expects to launch the offering as soon as possible in May 2023 after it hears from the Staff on the Registration Statement.

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If you have any questions regarding the Registration Statement, please contact the undersigned, partner at Skadden, Arps, Slate, Meagher & Flom LLP, by phone at +852 3740 4858 or via e-mail at shu.du@skadden.com.

Very truly yours,

/s/ Shu Du Shu Du

cc: Mr. Alex Wu, Chief Financial Officer, NaaS Technology Inc. Mr. Ching-Yang Lin, Esq., Partner, Sullivan & Cromwell (Hong Kong) LLP Ms. Christine JH Zhang, Partner, Ernst & Young Hua Ming LLP