

Airspan Networks Holdings Inc.  
777 Yamato Road, Suite 301  
Boca Raton, Florida 33431

**VIA EDGAR**

September 16, 2021

Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, NE  
Washington, D.C. 20549  
Attention: Gregory Herbers

**Re: Airspan Networks Holdings Inc.  
Acceleration Request for Registration Statement on Form S-1  
File No. 333- 259446**

Ladies and Gentlemen:

Pursuant to Rule 461 under the Securities Act of 1933, as amended (the “*Act*”), Airspan Networks Holdings Inc. (the “*Company*”) hereby requests that the effective date and time of the above-referenced registration statement (the “*Registration Statement*”) be accelerated to September 20, 2021, at 4:00 p.m., Eastern Time, or at such later time as the Company or its counsel may orally request via telephone call to the staff of the Division of Corporation Finance of the Securities and Exchange Commission (the “*Commission*”). In making this acceleration request, the Company acknowledges that it is aware of its responsibilities under the Act. Once the Registration Statement is effective, please orally confirm the event with our counsel, Dorsey & Whitney LLP, by calling Clint Foss at (206) 903-5444. We also respectfully request that a copy of the written order from the Commission verifying the effective time and date of the Registration Statement be sent to our counsel, Dorsey & Whitney LLP, Attention: Clint Foss.

In connection with the foregoing, the Company hereby acknowledges the following:

- should the Commission or the staff of the Commission, acting pursuant to delegated authority, declare the Registration Statement effective, it does not foreclose the Commission from taking any action with respect to the Registration Statement;
- the action of the Commission or the staff of the Commission, acting pursuant to delegated authority, in declaring the Registration Statement effective, does not relieve the Company from its full responsibility for the adequacy and accuracy of the disclosure in the Registration Statement; and
- the Company may not assert staff comments and the declaration of effectiveness as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

If you have any questions regarding this request, please contact Clint Foss of Dorsey & Whitney LLP at (206) 903-5444.

Sincerely,

Airspan Networks Holdings Inc.

/s/ David Brant

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David Brant

Senior Vice President and Chief Financial Officer

CC: Clint Foss, *Dorsey & Whitney LLP*

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