### WEIBO CORPORATION

8/F, QIHAO Plaza, No. 8 Xinyuan S. Road Chaoyang District, Beijing 100027 People's Republic of China

## FOIA CONFIDENTIAL TREATMENT REQUEST PURSUANT TO 17 C.F.R. § 200.83 BY WEIBO CORPORATION

### The entity requesting confidential treatment is

**Weibo Corporation** 8/F, QIHAO Plaza, No. 8 Xinyuan S. Road Chaoyang District, Beijing 100027 People's Republic of China

November 8, 2019

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#### **VIA EDGAR**

Joyce Sweeney, Staff Accountant Division of Corporation Finance Office of Information Technologies and Services Securities and Exchange Commission 100 F Street, N.E. Washington, D.C. 20549

Re: Weibo Corporation (the "Company")

Form 20-F for Fiscal Year Ended December 31, 2018

Filed on April 29, 2019 File No. 001-36397

Dear Ms. Sweeney:

This letter sets forth the Company's supplemental responses to comment No. 1 contained in the letter dated October 1, 2019 from the staff (the "Staff") of the Securities and Exchange Commission (the "Commission") regarding the Company's Form 20-F for the fiscal year ended December 31, 2018 (the "2018 Form 20-F"). All capitalized terms used but not defined in this letter shall have the meaning ascribed to such terms in the 2018 Form 20-F.

Due to the commercially sensitive nature of the information contained herein, the Company respectfully requests that, in accordance with Rule 83 of the Commission's Rules on Information and Requests, 17 C.F.R. § 200.83, the information contained in this letter be treated as confidential information and not be disclosed pursuant to any request under the Freedom of Information Act (5 U.S.C. § 522) ("FOIA").

In response to the Staff's comment, the Company supplementally furnishes the following metrics to facilitate the Staff's review.

	2016	2017	2018
Total advertiser number	2,518,827	2,554,586	2,937,134
Average spending per advertiser excluding Alibaba (in US\$)	204	357	470
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***	***	***	***

<sup>\*\*\*</sup> FOIA Confidential Treatment Requested Pursuant to 17 C.F.R. § 200.83 by Weibo Corporation

The Company respectfully advises the Staff that quantitatively disclosing either the total advertiser number or the average spending per advertiser on an annual basis should provide investors sufficient material information to evaluate the Company's advertising business, and same approach has been adopted by peer issuers in their discussion of advertising business. As explained in the Company's earlier responses, although the Company tracks these metrics related to key accounts and SME customers internally, further bifurcating and disclosing the total number of advertisers and average spending per advertiser based on these two categories will not provide the investors with meaningful insights on the Company's results of operations for two reasons: (a) few other peer issuers disclose comparable metrics in this level of granularity, and voluntary disclosure of this information may put the Company at competitive disadvantage; and (b) each peer issuer adopts different methodology in defining and categorizing their advertising related metrics, and voluntary disclosure of this information would not provide meaningful information to the investors for benchmarking purposes.

\* \* \*

<sup>\*\*\*</sup>Redacted Pursuant to FOIA Confidential Treatment Request\*\*\*

If you have any additional questions or comments regarding the 2018 Form 20-F, please contact the undersigned at +86 10 8262 8888.

Very truly yours,

/s/ Gaofei Wang

Gaofei Wang

Chief Executive Officer

Z. Julie Gao, Esq., Partner, Skadden, Arps, Slate, Meagher & Flom LLP Amanda Zhang, Partner, PricewaterhouseCoopers Zhong Tian LLP

cc:

# Schedule A

FOIA Confidential Treatment Requested Pursuant to 17 C.F.R. § 200.83 by Weibo Corporation for Schedule A.