

June 14, 2018

Lei Li  
Chief Executive Officer  
Qtech, Ltd.  
11/F, Block 3, Xing Chuang Technology Center  
Shen Jiang Road 5005  
Pudong New Area, Shanghai, 200120  
People's Republic of China

Re: Qtech, Ltd.  
Amendment No. 2 to Draft Registration Statement on Form F-1  
Submitted May 23, 2018  
CIK No. 0001733298

Dear Mr. Li:

We have reviewed your amended draft registration statement and have the following comment. In our comment, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by providing the requested information and either submitting an amended draft registration statement or publicly filing your registration statement on EDGAR. If you do not believe our comments apply to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing the information you provide in response to this comment and your amended draft registration statement or filed registration statement, we may have additional comments.

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1. Please revise to provide the duration of the membership registration agreement with Baidu.

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You may contact Morgan Youngwood, Staff Accountant, at (202) 551-3479 or Stephen Krikorian, Accounting Branch Chief, at (202) 551-3488 if you have questions regarding comments on the financial statements and related matters. Please contact Matthew Derby, Attorney-Advisor, at (202) 551-3334 or me at (202) 551-3673 with any other questions.

Sincerely,

/s/ Folake Ayoola

Folake Ayoola  
Special Counsel  
Office of Information  
Technologies and Services

cc: Chris Lin, Esq.  
Simpson Thacher & Bartlett LLP