## Seachange International, Inc.

500 Totten Pond Road Waltham, MA 02451 (978) 897-0100

February 10, 2021

Securities and Exchange Commission Division of Corporation Finance 100 F Street N.E. Washington, D.C. 20549

Attention: Ms. Beverly Singleton

Re: Seachange International, Inc. Registration Statement on Form S-3 Filed February 5, 2021 File No. 333-252777

## Ladies and Gentlemen:

Pursuant to Rule 461 promulgated under the Securities Act of 1933, as amended, Seachange International, Inc. (the "Company") hereby respectfully requests acceleration of the effectiveness of the above-referenced Registration Statement so that such Registration Statement will become effective as of 9:00 a.m. Eastern Daylight Time, February 12, 2021, or as soon as practicable thereafter.

Very truly yours,

Seachange International, Inc.

By: /s/ Michael Prinn

Michael Prinn Chief Financial Officer