

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

July 31, 2025

Mike Schmidt Chief Executive Officer Nixxy, Inc. 1178 Broadway, 3rd Floor New York, NY 10001

Re: Nixxy, Inc.

Registration Statement on Form S-3

Filed July 29, 2025 File No. 333-289042

Dear Mike Schmidt:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rule 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Marion Graham at 202-551-6521 with any questions.

Sincerely,

Division of Corporation Finance Office of Technology

cc: Max Lindenfeld