



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

DIVISION OF
CORPORATION FINANCE

Mail Stop 3561

November 1, 2016

Mr. Alon Raich
Chief Financial Officer
ICTS International N.V.
Walaardt Sacréstraat 425-4
1117 BM Schiphol-Oost
The Netherlands

Re: ICTS International N.V.
Form 20-F for the Fiscal Year Ended December 31, 2015
Filed April 27, 2016
File No. 0-28542

Dear Mr. Raich:

We have completed our review of your filing. 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.

Sincerely,

/s/ Jennifer Thompson

Jennifer Thompson
Accounting Branch Chief
Officer of Consumer Products