



DIVISION OF
CORPORATION FINANCE

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

February 25, 2020

Via E-mail

Kenneth D. Tuchman
Chief Executive Officer
TTEC Holdings, Inc.
9197 S. Peoria Street
Englewood, CO 80112

**Re: TTEC Holdings, Inc.
Form 8-K
Exhibit No. 10.99 – Membership Interest Purchase Agreement, dated October 26,
2019, by and among Ortana Holdings, LLC, an Oregon limited liability company, First
Call Resolution, LLC, an Oregon limited liability company, John Stadter, Matthew
Achak, and TTEC Services Corporation, a Colorado corporation
Filed October 29, 2019
File No. 001-11919**

Dear Mr. Tuchman:

We have concluded our assessment of your redacted exhibit for compliance with applicable form requirements and will process your supplemental response and related materials in accordance with your request.

Sincerely,

Division of Corporation Finance