



DIVISION OF
CORPORATION FINANCE

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

February 10, 2021

Michael D. Prinn
Chief Financial Officer
SEACHANGE INTERNATIONAL INC
500 Totten Pond Road
Waltham, MA 02451

Re: SEACHANGE INTERNATIONAL INC
Registration Statement on Form S-3
Filed February 5, 2021
File No. 333-252777

Dear Mr. Prinn:

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

Please refer to Rules 460 and 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 Beverly Singleton at (202) 551-3328 with any questions.

Sincerely,

Division of Corporation Finance
Office of Manufacturing