



DIVISION OF  
CORPORATION FINANCE

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

February 10, 2020

Anthony Hayes  
Chief Executive Officer  
Spherix Incorporated  
One Rockefeller Plaza, 11th Floor  
New York, NY 10020

**Re: Spherix Incorporated**  
**Registration Statement on Form S-1**  
**Filed January 31, 2020**  
**File No. 333-236199**

Dear Mr. Hayes:

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 Jonathan Burr at 202-551-5833 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Real Estate & Construction