

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

December 15, 2020

Maurizio Nicolelli Chief Financial Officer ExlService Holdings, Inc. 320 Park Avenue, 29th Floor New York, New York 10022

> Re: ExlService Holdings, Inc. Form 10-K for the Year Ended December 31, 2019 Filed February 27, 2020 File No. 001-33089

Dear Mr. Nicolelli:

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,

Division of Corporation Finance Office of Trade & Services