

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

July 24, 2020

Douglas Satzman Chief Executive Officer XpresSpa Group, Inc. 254 West 31st Street, 11th Floor New York, New York 10001

Re: XpresSpa Group, Inc.
Registration Statement on Form S-3
Filed July 17, 2020
File No. 333-239913

Dear Mr. Satzman:

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 Katherine Bagley at (202) 551-2545 with any questions.

Sincerely,

Division of Corporation Finance Office of Trade & Services

cc: Daniel A. Bagliebter, Esq.