

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

October 21, 2021

David M. Clapper Chief Executive Officer Minerva Surgical, Inc. 4255 Burton Drive Santa Clara, CA 95054

Re: Minverva Surgical, Inc.

Registration Statement on Form S-1

Exhibit Nos. 10.7, 10.8, 10.11, 10.12 and 10.19

Filed September 27, 2021 File No. 333-259832

Dear Mr. Clapper:

We have concluded our assessment of your redacted exhibits 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