

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

January 31, 2025

Svetlana Belychova Chief Executive Officer Orbit Innovations Group Inc. Vrabci 9 Prague, Czech Republic 18200

Re: Orbit Innovations Group Inc.
Amendment No. 1 to Registration Statement on Form S-1
Filed January 6, 2025
File No. 333-283342

Dear Svetlana Belychova:

We have reviewed your amended registration statement and have the following comment(s).

Please respond to this letter by amending your registration statement and providing the requested information. If you do not believe a comment applies to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your registration statement and the information you provide in response to this letter, we may have additional comments. Unless we note otherwise, any references to prior comments are to comments in our December 17, 2024 letter.

Amendment No. 1 to Registration Statement on Form S-1 Filed January 6, 2025

Description of Business

General Information, page 22

1. We note your revised disclosure in response to prior comment 8. Please provide additional detail regarding the anticipated timeline of operations. We note in your Plan of Operations that you expect certain projects will take certain estimated periods, for example, that Design Software is anticipated to take one to two months. To give additional information to investors, please elaborate on your anticipated timeline to provide a potential start date for the disclosed stages of development.

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2. Please revise your Exhibit Index to include the consent associated with your counsel's legal opinion, filed as Exhibit 5.1. Refer to Item 601(b)(23)(i) of Regulation S-K.

Please contact Patrick Kuhn at 202-551-3308 or Adam Phippen at 202-551-3336 if you have questions regarding comments on the financial statements and related matters. Please contact Alyssa Wall at 202-551-8106 or Cara Wirth at 202-551-7127 with any other questions.

Sincerely,

Division of Corporation Finance Office of Trade & Services