



DIVISION OF
CORPORATION FINANCE

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

August 14, 2025

Michael D. Hill
Chief Financial Officer and Treasurer
Upland Software, Inc.
401 Congress Ave. , Suite 1850
Austin, Texas 78701

Re: Upland Software, Inc.
Form 10-K filed on March 12, 2025
File No. 001-36720

Dear Michael D. Hill:

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 Technology