



DIVISION OF  
CORPORATION FINANCE

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

October 24, 2024

Sanjay Datta  
Chief Financial Officer  
Upstart Holdings, Inc.  
2950 S. Delaware Street  
Suite 410  
San Mateo, California 94403

**Re: Upstart Holdings, Inc.  
Annual Report on Form 10-K for the Fiscal Year Ended December 31, 2023  
File Number 001-39797**

Dear Sanjay Datta:

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 Finance