

June 12, 2025

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549

**RE: XTI Aerospace, Inc.**  
**Registration Statement on Form S-1**  
**Filed June 12, 2025**  
**File No. 333-287989**

**Acceleration Request**  
**Requested Date: Monday, June 16, 2025**  
**Requested Time: 5:00 p.m. Eastern Time**

Ladies and Gentlemen:

In accordance with Rule 461 under the Securities Act of 1933, as amended, the undersigned registrant (the “**Registrant**”) hereby requests that the Securities and Exchange Commission (the “**Commission**”) take appropriate action to cause the above-referenced Registration Statement on Form S-1 (File No. 333-287989) (the “**Registration Statement**”) to become effective on Monday, June 16, 2025, at 5:00 p.m. Eastern Time, or as soon thereafter as possible, or at such later time as the Registrant or its outside counsel, Mitchell Silberberg & Knupp LLP, may orally request via telephone call to the staff.

Once the Registration Statement has been declared effective, please orally confirm that event with our outside counsel by calling Blake Baron at (917) 546-7709.

Very truly yours,

XTI Aerospace, Inc.

By: /s/ Scott Pomeroy  
Scott Pomeroy  
Chief Executive Officer