

**Holicy Inc.**  
2300 Carillon Point  
Kirkland, WA 98033

July 30, 2020

**VIA EDGAR**

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

**Re: Holicy Inc.**  
**Registration Statement on Form S-1**  
**Filed July 17, 2020, as amended**  
**File No. 333-239926**

Dear Mr. Ingram:

Pursuant to Rule 461 of the rules and regulations promulgated under the Securities Act of 1933, as amended, Holicy Inc. respectfully requests that the effective date of the above-referenced Registration Statement be accelerated so as to permit it to become effective at 4:00 p.m. Washington D.C. time on August 3, 2020, or as soon thereafter as practicable.

Please call David A. Sakowitz of Winston & Strawn LLP at (212) 294-2369 to provide notice of the effectiveness of the Registration Statement.

*[Signature Page Follows]*

---

Very truly yours,

**Holicity Inc.**

By: /s/ Steve Ednie

Name: Steve Ednie

Title: Chief Financial Officer

cc: David A. Sakowitz, Winston & Strawn LLP

*[Signature Page to Acceleration Request]*

---