

June 28, 2024

VIA EDGAR

United States Securities and Exchange Commission
Division of Corporation Finance
Office of Technology
100 F Street, NE
Washington, D.C. 20549-3561

Re: Drilling Tools International Corporation
Registration Statement on Form S-4
Filed June 25, 2024
File No. 333-279319

Dear Mr. Plattner:

Drilling Tools International Corporation, a Delaware corporation (the "Company"), respectfully requests pursuant to Rule 461 under the Securities Act of 1933, as amended, that the effective date of the Company's Registration Statement on Form S-4, as amended (File No. 333-279319), be accelerated and that it be declared effective on July 2, 2024, at 4:00 p.m. Eastern Time, or as soon as practicable thereafter.

Please direct any questions regarding this filing to Michael J. Blankenship of Winston & Strawn LLP at (713) 651-2678.

Very truly yours,

DRILLING TOOLS INTERNATIONAL CORPORATION

By: /s/ David Johnson

Name: David Johnson

Title: Chief Financial Officer

cc: R. Wayne Prejean
President, Chief Executive Officer, and Director
Drilling Tools International Corporation

cc: Michael J. Blankenship
Winston & Strawn LLP