

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

DIVISION OF CORPORATION FINANCE

November 21, 2024

Kenneth Gianella Chief Financial Officer Quantum Corporation 224 Airport Parkway, Suite 550 San Jose, CA 95110

Re: Quantum Corporation Form 10-K for Fiscal Year Ended March 31, 2024 File No. 001-13449

Dear Kenneth Gianella:

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

cc: Brian Cabrera