

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

DIVISION OF CORPORATION FINANCE

February 3, 2025

Brian E. CabreraChief Administrative OfficerQuantum Corporation224 Airport Parkway, Suite 550San Jose, California 95110

Re: Quantum Corporation Registration Statement on Form S-1 Filed January 27, 2025 File No. 333-284528

Dear Brian E. Cabrera:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rule 461 regarding requests for acceleration. 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.

Please contact Marion Graham at 202-551-6521 with any questions.

Sincerely,

Division of Corporation Finance Office of Technology

cc: James J. Masetti