

September 25, 2024

Qingfeng Feng  
Chief Executive Officer  
Lotus Technology Inc.  
No. 800 Century Avenue  
Pudong District, Shanghai, People's Republic of China

Re: Lotus Technology Inc.  
Registration Statement on Form F-1  
Filed September 19, 2024  
File No. 333-282217

Dear Qingfeng Feng:

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

Please refer to Rules 460 and 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 Eranga Dias at 202-551-8107 with any questions.

Sincerely,

Division of

Office of

Corporation Finance

Manufacturing