

November 14, 2019

Raymond W. Cohen
Chief Executive Officer
Axonics Modulation Technologies, Inc.
26 Technology Drive
Irvine, California 92618

Re: Axonics Modulation Technologies, Inc.
Registration Statement on Form S-3
Filed November 6, 2019
File No. 333-234546

Dear Mr. Cohen:

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 Chris Edwards at (202) 551-6761 with any questions.

Sincerely,
Division of
Office of Life

Corporation Finance

Sciences

cc: Jason C. Dreibelbis