

November 9, 2022

Glendon E. French
President and Chief Executive Officer
Pulmonx Corporation
700 Chesapeake Drive
Redwood City, CA 94063

Re: Pulmonx Corporation
Registration

Statement on Form S-3

Filed November 3,

2022

File No. 333-268130

Dear Glendon E. French:

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 Benjamin

Richie at 202-551-7857 with any questions.

Sincerely,

Division of Corporation Finance
Office of Industrial Applications and
Services

cc:

Mark Weeks