



DIVISION OF  
CORPORATION FINANCE

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

December 20, 2024

Ziyu Shen  
Chief Executive Officer  
ECARX Holdings Inc.  
12/F, Tower 2, Park Place  
88 Baise Road  
Xuhui District, Shanghai 200231  
People's Republic of China

**Re: ECARX Holdings Inc.**  
**Registration Statement on Form F-3**  
**Filed December 17, 2024**  
**File No. 333-283854**

Dear Ziyu Shen:

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: Shu Du