

**Axonics Modulation Technologies, Inc.**  
26 Technology Drive  
Irvine, California 92618

October 26, 2018

VIA EDGAR

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549  
Attn: Geoff Kruczek

**Re: Axonics Modulation Technologies, Inc.  
Registration Statement on Form S-1  
Filed on October 5, 2018 (as amended)  
File No. 333-227732  
Request for Acceleration**

**Acceleration Request**

**Request Date:** October 30, 2018

**Request Time:** 4:00 p.m. Eastern Time (or as soon thereafter as practicable)

Dear Mr. Kruczek:

Pursuant to Rule 461 promulgated under the Securities Act of 1933, as amended, Axonics Modulation Technologies, Inc., a Delaware corporation (the “**Registrant**”), hereby respectfully requests that the Securities and Exchange Commission (the “**Commission**”) take appropriate action to cause the above-referenced Registration Statement on Form S-1 (File No. 333-227732), to become effective at 4:00 p.m. Eastern Time on October 30, 2018, or as soon thereafter as practicable, or at such later time as the Registrant or its counsel may orally request via telephone call to the staff of the Commission. The Registrant hereby authorizes K&L Gates LLP, counsel to the Registrant, to orally modify or withdraw this request for acceleration.

The Registrant requests that it be notified of such effectiveness by a telephone call to Michael A. Hedge at (949) 623-3519, or in his absence, Jason C. Dreibelbis at (949) 623-3543.

Sincerely,

AXONICS MODULATION TECHNOLOGIES, INC.

By: /s/ Raymond W. Cohen

Raymond W. Cohen  
Chief Executive Officer

cc: Michael Williamson, Axonics Modulation Technologies, Inc.  
Michael A. Hedge, K&L Gates LLP  
Jason C. Dreibelbis, K&L Gates LLP