March 30, 2022

Stephen N. Cannon Chief Executive Officer Archimedes Tech Spac Partners Co. 2093 Philadelphia Pike #1968 Claymont, DE 19703

Spac Partners Co.

Registration Statement on Form S-4

2022

Dear Mr. Cannon:

We have reviewed your amended registration statement and have the following

comment. In our comment, we may ask you to provide us with information so we may better  $% \left( 1\right) =\left( 1\right) +\left( 1\right) +\left($ 

understand your disclosure.

 $\,\,$  Please respond to this letter by amending your registration statement and providing the

requested information. If you do not believe our comment applies to your facts and

circumstances or do not believe an amendment is appropriate, please tell us why in your response.

 $\hbox{ After reviewing any amendment to your registration statement and the information you}\\$ 

provide in response to our comment, we may have additional comments.

Amendment No. 3 to Registration Statement on Form S-4  $\,$ 

Unaudited Pro Forma Condensed Combined Financial Information, page 162

1. We note your disclosure on page 175 that the pro forma combined financial statements do not reflect the issuance by SoundHound of shares of SoundHound Class B Common Stock. Considering that SoundHound s creation of the SoundHound Class B Common Stock has now been approved by the SoundHound stockholders, please explain why the SoundHound Class B Common Stock expected to be issued prior to closing and the resulting incremental compensation expense charge are not reflected in the pro forma combined financial

You may contact Melissa Walsh, Senior Staff Accountant, at (202) 551-3224 or Stephen

Krikorian, Accounting Branch Chief, at (202) 551-3488 if you have questions regarding

Stephen N. Cannon

Archimedes Tech Spac Partners Co.

March 30, 2022

statements.

Page 2

comments on the financial statements and related matters. Please contact Matthew Crispino,  $\$ 

Staff Attorney, at (202) 551-3456 or Jan Woo, Legal Branch Chief, at (202) 551-3453 with any

other questions.

Sincerely,

Re: Archimedes Tech

Amendment No. 3 to

File No. 333-262094

Filed March 25,

Corporation Finance Comapany NameArchimedes Tech Spac Partners Co.

Office of Technology

March 30, 2022 Page 2 cc: Giovanni Caruso

FirstName LastName