United States securities and exchange commission logo

March 5, 2021

Stephen N. Cannon

Chief Executive Officer

Archimedes Tech SPAC Partners Co.

2093 Philadelphia Pike #1968

Claymont, DE 19703

Re: Archimedes Tech

SPAC Partners Co.

Amendment No. 1 to

Registration Statement on Form S-1

Filed March 1, 2021

File No. 333-253108

Dear Mr. Cannon:

We have reviewed your amended registration statement and have the

following

comments. In some of our comments, we may ask you to provide us with information so we

may better understand your disclosure.

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

requested information. If you do not believe our comments apply to your facts and

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

response.

After reviewing any amendment to your registration statement and

the information you

provide in response to these comments, we may have additional comments.

Amendment No.1 to Registration Statement on Form S-1

Financial Statements, page F-1

1. Revise your

presentation to include only financial statements as of and for the period

ending December 31,

2020. Expand your subsequent events footnote as necessary to

disclose events or

transactions occurring after December 31, 2020.

Stephen N. Cannon

FirstName

ArchimedesLastNameStephen N. Cannon

Tech SPAC Partners Co.

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March NameArchimedes Tech SPAC Partners Co.

5, 2021

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FirstName LastName

You may contact Shannon Buskirk, Staff Accountant, at (202) 551-3717 or

Ethan

Horowitz, Accounting Branch Chief, at (202) 551-3311 if you have questions regarding

comments on the financial statements and related matters. Please contact Karina Dorin, Staff

Attorney, at (202) 551-3763 or Laura Nicholson, Special Counsel, at (202)

551-3584 with any

other questions.

Sincerely,

Division of

Corporation Finance

Office of Energy &

Transportation

cc: Giovanni Caruso