

August 18, 2021

Kenneth Tuchman  
Chief Executive Officer  
TTEC Holdings, Inc.  
9197 South Peoria Street  
Englewood, Colorado 80112

Re: TTEC Holdings, Inc.  
Form 10-K for the

Year Ended December 31, 2020

Filed March 1, 2021  
Form 8-K filed

August 4, 2021

File No. 001-11919

Dear Mr. Tuchman:

We have reviewed your filing 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 these comments within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comments apply to your facts and circumstances, please tell us why in your response.

After reviewing your response to these comments, we may have additional comments.

Form 10-K for the Year Ended December 31, 2020

TTEC Holdings, Inc. and Subsidiaries Consolidated Financial Statements  
Notes to the Consolidated Financial Statements  
(2) Acquisitions, page F-17

1. Your disclosure in Note 2 indicates that you recognized redeemable non-controlling interests at fair value using Level 3 inputs in connection with the acquisitions of Serendebite and First Call Resolution, LLC during 2020 and 2019. We also note that these non-controlling interests are potentially redeemable between January 31, 2023 and December 31, 2023 at a multiple of each acquired entity's trailing twelve month EBITDA. Given this factor, please revise to explain how you plan to account for potential changes in the redemption value of these redeemable non-controlling interests in your financial statements.

Refer to the guidance in paragraph 15 of ASC 480-10-S99-3A.

Kenneth Tuchman  
TTEC Holdings, Inc.  
August 18, 2021  
Page 2

Report on Form 8-K filed August 4, 2021

Exhibit 99.1  
Business Outlook, page 3

2. In your press release furnished as Exhibit 99.1 to your report on Form 8-K, you provide 2021 Non-GAAP outlook information including Non-GAAP Operating Income margins, Non-GAAP Adjusted EBITDA margins and Non-GAAP earnings per share amounts without providing equally prominent disclosure of the related GAAP measures or a

reconciliation of the Non-GAAP measures to the most comparable GAAP measures.

Please revise your press releases to include disclosure of the most comparable GAAP

measures on a 2021 outlook basis along with reconciliations of the Non-GAAP measures

to the most comparable GAAP measures. Refer to the guidance in Regulation G and

Question 102.10 of the Compliance and Disclosure Interpretations Regarding Non-GAAP

Measures.

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.

You may contact Blaise Rhodes at 202-551-3774 or Linda Cvrkel at 202-551-3813 if you have questions.

FirstName LastNameKenneth Tuchman  
Comapany NameTTEC Holdings, Inc.

Corporation Finance  
August 18, 2021 Page 2  
Services  
FirstName LastName

Sincerely,

Division of

Office of Trade &