

**STELLAR ACQUISITION III INC.**  
**90 Kifissias Avenue**  
**Maroussi Athens, Greece**

November 13, 2018

**VIA EDGAR**

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, DC 20549  
Attn: Folake Ayoola, Special Counsel

Re: Stellar Acquisition III Inc.  
Registration Statement on Form S-4  
Filed April 11, 2018, as amended  
File No. 333-224227

Dear Ms. Ayoola:

Pursuant to Rule 461 promulgated under the Securities Act of 1933, as amended, Stellar Acquisition III Inc. hereby requests acceleration of the effectiveness of the above referenced Registration Statement so that it will become effective at 4:00 p.m. Eastern Time on November 13, 2018, or as soon as thereafter practicable.

Very truly yours,

/s/ George Syllantavos

George Syllantavos  
Co-Chief Executive Officer, Chief Financial Officer (Principal  
Financial and Accounting Officer