December 6, 2022

Rathna Girish Mathrubootham Chief Executive Officer Freshworks Inc. 2950 S. Delaware Street, Suite 201 San Mateo, CA 94403

> Re: Freshworks Inc. Form 10-K for the

Fiscal Year Ended December 31, 2021

Filed February 23,

2022

File No. 001-40806

Dear Rathna Girish Mathrubootham:

We have reviewed your December 2, 2022 response to our comment letter and have the $\,$

following comments. In some of our comments, we may ask you to provide us with information $% \left(1\right) =\left(1\right) +\left(1\right)$

so we may better understand your disclosure.

 $\hbox{Please respond to these comments within ten business days by providing the requested } \\$

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.

 $\label{eq:comments} \mbox{ After reviewing your response to these comments, we may have additional}$

comments. Unless we note otherwise, our references to prior comments are to comments in our

November 17, 2022 letter.

Form 10-K for the Fiscal Year Ended December 31, 2021

Item 7. Management's Discussion and Analysis of Financial Condition and Results of Operations

Key Business Metrics, page 50

- 1. We note from your response to prior comment 1 that you consider the number of customers contributing more than \$5,000 in ARR and net dollar retention rate to be the best indicators of trends in your business. Therefore, tell us your consideration to disclose these metrics for each period in which financial statements are provided (e.g. fiscal 2019).

 Results of Operations, page 54
- 2. We note your response to prior comment 3 where you state that you will disclose the net dollar retention rate and number of paying customers in future filings to explain the increase in revenue from new versus existing customers. Please also disclose the

from new versus existing customers. Please also disclose the

Rathna Girish Mathrubootham

Freshworks Inc. $\,$

December 6, 2022

Page 2

percentage or dollar amount of change in revenue attributable to both new and existing

customers to add further context to the impact of such metrics on your revenue growth.

You may contact Megan Akst, Senior Staff Accountant at 202-551-3407 or Kathleen

Collins, Accounting Branch Chief at 202-551-3499 if you have questions.

Sincerely,

Corporation Finance Comapany NameFreshworks Inc.

December 6, 2022 Page 2 cc: Jon Avina FirstName LastName

Office of Technology