

Impel NeuroPharma, Inc.

201 Elliott Avenue West, Suite 260
Seattle, WA 98119

April 20, 2021

VIA EDGAR

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Life Sciences
100 F Street, N.E.
Washington, D.C. 20549

Attention: David Gessert
Tim Buchmiller
Jeanne Bennet
Lynn Dicker

Re: Impel NeuroPharma, Inc. Registration Statement on Form S-1 (File No. 333-254999)
originally filed April 2, 2021, as amended, and corresponding Registration Statement on
Form 8-A (File No. 001-40353) filed April 19, 2021

Requested Date: April 22, 2021
Requested Time: 4:30 PM Eastern Time

Ladies and Gentlemen:

Impel NeuroPharma, Inc. (the "**Registrant**") hereby requests that the Securities and Exchange Commission take appropriate action to declare the above-captioned Registration Statements on Form S-1 and Form 8-A effective at the "Requested Date" and "Requested Time" set forth above or as soon thereafter as practicable.

The Registrant hereby authorizes Amanda L. Rose or Alan C. Smith, both of whom are attorneys with the Registrant's outside legal counsel, Fenwick & West LLP, to orally modify or withdraw this request for acceleration.

The Registrant requests that it be notified of such effectiveness by a telephone call to Ms. Rose at (206) 389-4553, or, in her absence, Mr. Smith at (206) 389-4530.

* * *

Sincerely,

IMPEL NEUROPHARMA, INC.

By: /s/ Adrian Adams

Adrian Adams
Chief Executive Officer

cc: Adrian Adams, President and Chief Executive Officer
John Leaman, M.D., Chief Financial Officer
Impel NeuroPharma, Inc.

Alan Smith, Esq.
Amanda L. Rose, Esq.
Ryan Mitteness, Esq.
Fenwick & West LLP

[Signature Page to Company Acceleration Request Letter]