## February 5, 2021

Amir Schlachet Chief Executive Officer Global-E Online Ltd. 25 Basel Street Petah Tikva 4951038, Israel

Re: Global-E Online

Ltd.

Amendment No. 1 to

Draft Registration Statement on Form F-1

Submitted January

22, 2021

CIK No. 0001835963

Dear Mr. Schlachet:

We have reviewed your amended draft registration statement and have the following  $\boldsymbol{\theta}$ 

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 providing the requested information and either submitting

an amended draft registration statement or publicly filing your registration statement on  $% \left( 1\right) =\left( 1\right) +\left( 1\right) +$ 

EDGAR. 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.

 $\qquad \qquad \text{After reviewing the information you provide in response to these comments and your } \\$ 

amended draft registration statement or filed registration statement, we may have additional

comments. References to prior comments are to those in our letter dated January 13, 2021.

Amendment No. 1 to Draft Registration Statement on Form F-1

Risk Factors

"Legal, political, and economic uncertainty surrounding the exit of the United Kingdom from the EU..." , page 34  $\,$ 

1. Please update this risk factor as the transition period during which EU rights and obligations still applied to the UK expired on December 31, 2020.

Results of Operations

Year ended December 31, 2019 compared to year ended December 31, 2018 , page 77  $\,$ 

2. We note you now separately present revenue and cost of revenue by service fees and

fulfillment in response

to prior comment 6. However, it does not appear that you Amir Schlachet

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separately analyze revenue and cost of revenue between service fees and fulfillment

revenue. Please expand your disclosures accordingly. Refer to Section III.B of SEC  $\,$ 

Release No. 33-8350.

Notes to Consolidated Financial Statements

Note 2. Summary of Significant Accounting Policies

Revenue Recognition, page F-10

3. We have reviewed your response to prior comment 14. Please include more of your  ${\sf vol}$ 

response in your disclosure. In this regard, revise your disclosure to

indicate that you do

provide your platform service solution on a standalone basis. Please disclose the amount

of revenue recognized from the sale of platform service solutions without fulfillment

services.

We have reviewed your response to prior comment 15. To help the staff understand the

conclusion reached by the Company, we have the following comments. Please clarify

whether you have a present right for payment upon the products arrival at your hub. We

refer you to ASC 606-10-25-30. Explain how you determined that the service obligation

is separately identifiable from the fulfillment obligation. Refer to ASC 606-10-25-19(b)

and 25-21. In this regard, it seems that your customers are utilizing your services to

consummate the sale and deliver the product to the shopper. Tell us whether risk of

satisfying that outcome binds the two obligations into one combined promised service

(i.e., the delivery of desired product to the shopper).

You may contact Ryan Rohn, Staff Accountant, at (202) 551-3739 or Stephen Krikorian,

Accounting Branch Chief, at (202) 551-3488 if you have questions regarding comments on the

financial statements and related matters. Please contact Matthew Crispino, Staff Attorney, at

(202) 551-3456 or Larry Spirgel, Office Chief, at (202) 551-3815 with any other questions.

FirstName LastNameAmir Schlachet

Sincerely,

Corporation Finance

Division of

Comapany NameGlobal-E Online Ltd.

Office of

Technology February 5, 2021 Page 2 cc: Josh Kiernan FirstName LastName