

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

January 23, 2023

Lewis Bender Chief Executive Officer Intensity Therapeutics, Inc. 61 Wilton Road, 3rd Floor Westport, CT 06880

Re: Intensity Therapeutics, Inc.
Amendment No. 11 to Registration Statement on Form S-1
Filed January 13, 2023
File No. 333-260565

Dear Lewis Bender:

We have reviewed your amended registration statement 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 this letter by amending your registration statement and providing the requested information. 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.

After reviewing any amendment to your registration statement and the information you provide in response to these comments, we may have additional comments.

Amendment No. 11 to Form S-1 filed January 13, 2023

Our Strengths, page 54

1. Please expand your discussion to describe the grade 3 and 4 adverse events in your IT-01 study and quantify the number of each type of event, as well as all other serious adverse events. Make similar revisions throughout your document, including in the discussion of your results, to identify all serious adverse events and quantify the number of each type of event.

You may contact Sasha Parikh at 202-551-3627 or Al Pavot at 202-551-3738 if you have questions regarding comments on the financial statements and related matters. Please contact Jane Park at 202-551-7439 or Suzanne Hayes at 202-551-3675 with any other questions.

Lewis Bender Intensity Therapeutics, Inc. January 23, 2023 Page 2

Sincerely,

Division of Corporation Finance Office of Life Sciences

cc: Daniel Woodard, Esq.