

October 28, 2020

Howard W. Lutnick  
Chairman and Chief Executive Officer  
CF Finance Acquisition Corp. III  
110 East 59th Street  
New York, NY 10022

Acquisition Corp. III  
Registration Statement on Form S-1  
2020

Re: CF Finance  
Amendment No. 1 to  
Filed October 21,  
File No. 333-249367

Dear Mr. Lutnick:

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. 1 to Registration Statement on Form S-1

Risk Factors

Our warrant agreement will designate the courts of the State of New York or the United States District Court for the Southern District..., page 57

1. We note that your disclosure regarding the exclusive forum provision in your warrant agreement does not appear to be consistent with the form of warrant agreement filed as Exhibit 4.4 with respect to the courts selected as exclusive forum, and the courts identified with respect to the consent to jurisdiction. Please revise your prospectus disclosure or your form of warrant agreement to address this discrepancy.

Howard W. Lutnick  
CF Finance Acquisition Corp. III  
October 28, 2020  
Page 2

You may contact Jenifer Gallagher, Staff Accountant, at 202-551-3706 or John Cannarella, Staff Accountant, at 202-551-3337 if you have questions regarding comments on the financial statements and related matters. Please contact Irene Barberena-Meissner, Staff Attorney, at 202-551-6548 or Laura Nicholson, Special Counsel, at 202-551-3584 with any other questions.

Sincerely,

FirstName LastNameHoward W. Lutnick  
Corporation Finance  
Comapany NameCF Finance Acquisition Corp. III

Division of

Transportation

October 28, 2020 Page 2

cc: Stuart Neuhauser, Esq.

FirstName LastName