

April 1, 2022

Albert Foreman
Chief Executive Officer
Tuatara Capital Acquisition Corporation
655 Third Avenue, 8th Floor
New York, NY 10017

Re: Tuatara Capital
Amendment No. 1 to
Filed March 17,
File No. 333-262628

Acquisition Corporation
Registration Statement on Form S-4
2022

Dear Mr. Foreman:

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. Unless we note otherwise, our references to prior comments are to comments in our March 4, 2022 letter.

Amendment No. 1 to Form S-4 filed March 17, 2022

Questions and Answers About the Transaction Proposals for Tuatara Shareholders

If I am a warrant holder, can I exercise redemption rights with respect to my warrants?, page 26

1. We note your response to prior comment 1 regarding your post-business combination redemption rights for the public warrants. Please clarify that if your common stock price exceeds \$10 per share 30 days after the business combination, you may redeem the public warrants for \$0.10. Further clarify that the market value of the public warrants may greatly exceed either the redemption price or the cashless exercise price of the warrants, thus warrant holders may not realize the current market value of the public warrants.

Please consider adding

a risk factor to address this issue.

Albert Foreman
FirstName LastNameAlbert Foreman
Tuatara Capital Acquisition Corporation
Comapany
April NameTuatara Capital Acquisition Corporation
1, 2022

April 21, 2022 Page 2
Page

FirstName LastName
Unaudited Pro Forma Condensed Combined Financial Information
Introduction, page 172

2. Please revise your discussion of the \$13.1 million in subscription agreements, which you state will close immediately prior to closing, to clarify that \$7.0

million of convertible
notes included in such subscription has already been funded on
February 25, 2022.

3. We note your revised maximum redemption scenario assumes that the
shareholders
approve Proposal No. 10. Please revise to clarify that the maximum
redemption
scenario assumes that Tuatara's Articles of Incorporation are amended
such that they will
not be required to have at least \$5,000,001 in net tangible assets at
the time of the
transaction. Also, disclose what will happen if such Proposal is not
approved and include
a quantified discussion of how that might impact your pro forma
information, if material.
Business of SpringBig, page 196

4. We note your revised disclosures and response to prior comment 9 where
you state that
SpringBig compares the average recurring monthly revenue for all
customers as of the end
of the relevant period to the average recurring monthly revenue for
all customers as of the
comparable period, and you do not compare the same set of customers
across periods
when calculating your net revenue retention rate. Please address the
following:

Your disclosures continue to refer to comparing the average
recurring monthly
revenue during the prior twelve months divided by the average
recurring monthly
revenue over the same trailing twelve-month period. Explain how
this compares to
the references in your response to the "end of the relevant
period" and "as of the
comparable period."
Explain your reference to adjusting the average recurring monthly
revenue from retail
clients adjusted for losses, increases and decreases in monthly
subscriptions during
the prior twelve months.
Clarify whether this measure includes excess usage revenue and if
so, how such
revenues factor into your calculation.
Explain how this measure reflects your ability to retain customers
when you
do not compare the same set of customers across periods in
calculating the net
revenue retention rate. Clarify what this measure is intended to
represent and
consider revising the name, if necessary.

Explain to us the relevance of your revised disclosures regarding
the average net
revenue retention rate of 120% over the past two years,
particularly considering the
significant decrease in such measure from fiscal 2019 to fiscal
2020, or consider
removing this disclosure.
Provide us with a detailed example of how your retention rate was
determined for
both fiscal 2021 and 2020 and ensure that it is clear which
periods are being used to
determine the average monthly recurring revenue for both the end
of the relevant
period and the comparable period.

Revise your disclosure, as necessary, to address the questions
above and include a

Albert Foreman
Tuatara Capital Acquisition Corporation
April 1, 2022
Page 3

discussion of such calculation in your Key Operating and
Financial Metrics
disclosures.
Management's Discussion and Analysis of Financial Condition and Results of
Operations of
SpringBig
Factors Affecting Our Performance, page 208

5. Notwithstanding your response to our comment above, revise to include
an explanation of

the underlying reason(s) for the declining trend in your net revenue retention rate over the three year period presented. Refer to Item 303 of Regulation S-K and SEC Release No. 33-10751.

Key Operating and Financial Metrics, page 210

6. We note your response to prior comment 9. Please provide us with the percentage of total revenue attributed to excess use revenue for each month in fiscal 2020 and 2021, as previously requested.

Results of Operations

Comparison of Year Ended December 31, 2020 and 2021, page 214

7. We note you provide information regarding deals closed, average deal size and annual revenue in the analyst day presentation provided in the March 18, 2022 425 filing. You also present new annual contract value closed by quarter. Please tell us whether this information relates to only new customer deals. If so, explain further why you are unable to provide a quantified discussion of revenue growth by new versus existing customers.

8. Your disclosure attributes revenue growth in fiscal 2021 to the addition of new retail clients. Please tell us whether such growth can be further supported by the addition of new markets in which the sale of cannabis is now permitted and if so, revise to quantify the revenue growth attributable such markets. In this regard, we note your risk factor disclosure on page 51, which indicates that revenue growth may not be sustainable going forward due, in part, to the eventual decline in the number of new major geographic markets in which the sale of cannabis is permitted.

SpringBig, Inc. Notes to Consolidated Financial Statements

Note 2. Summary of Significant Accounting Policies

Revenue Recognition, page F-46

9. Please explain further your disclosure where you state that each customer is buying a "license" to the platform to receive all the benefits of the platform. In this regard, tell us

FirstName LastNameAlbert Foreman

whether your arrangements contain a license to intellectual property or provide a service

Comapany NameTuatara

to your Capital

customer with Acquisition

access

Corporation

to your platform and revise your

disclosures as necessary to

clarify. Refer

April 1, 2022 Page 3 to ASC 606-10-55-54(a).

FirstName LastName

Albert Foreman

FirstName LastNameAlbert Foreman

Tuatara Capital Acquisition Corporation

Comapany

April NameTuatara Capital Acquisition Corporation

1, 2022

April 41, 2022 Page 4

Page

FirstName LastName

General

10. We note that TCAC entered into a second agreement with CF&CO whereby CF&CO will

act as your financial advisor, placement agent and arranger in connection with any

financing for the business combination in exchange for certain agreed upon fees. Please

tell us whether you or CF&CO are currently in negotiations for, or intend to enter into

any, additional financing(s) other than those already disclosed. If so, please revise to

include a discussion of such financing(s), including the current status of any negotiations

and tell us your consideration to include the impact of such transactions in your pro forma financial statements.

11. Where appropriate, including the cover page, the Q&A and summary sections, please clarify that the business combination is not conditioned upon the approval of the Articles Amendment Proposal. The added disclosure should make clear that if the proposal is approved and substantially all of the non-affiliated public stock is redeemed, the public float of the company may be too small to sustain a liquid public market for the company's common stock, and if the proposal is not approved, significant redemptions could result in the business combination not being consummated.

You may contact Dave Edgar, Senior Staff Accountant, at (202) 551-3459 or Kathleen Collins, Accounting Branch Chief, at (202) 551-3499 if you have questions regarding comments on the financial statements and related matters. Please contact Edwin Kim, Staff Attorney, at (202) 551-3297 or Jan Woo, Legal Branch Chief, at 202-551-3453 with any other questions.

Sincerely,

Division of

Office of

Corporation Finance

Technology

cc: Leonard Kreyenin, Esq.