## UNITED STATES SECURITIES AND EXCHANGE COMMISSION July 23, 2021

## ORDER GRANTING CONFIDENTIAL TREATMENT UNDER THE SECURITIES EXCHANGE ACT OF 1934

## MINIM, INC.

File No. 001-37649 - CF#35692

MINIM, INC. (formerly Zoom Telephonics, Inc.) submitted an application under Rule 24b-2 requesting an extension of a previous grant of confidential treatment for information it excluded from the Exhibit to a Form 10-Q filed on November 9, 2017.

Based on representations by MINIM, INC. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibit will not be released to the public for the time periods specified:

Exhibit 10.1

through December 31, 2025

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Robert Errett Chief, Disclosure Management Office