



DIVISION OF  
CORPORATION FINANCE

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

November 1, 2018

Jack Dorsey  
Chief Executive Officer  
Square, Inc.  
1455 Market Street, Suite 600  
San Francisco, CA 94103

**Re: Square, Inc.**  
**Form 10-Q for the Quarter Ended March 31, 2018**  
**Filed May 2, 2018**  
**Form 10-Q for the Quarter Ended June 30, 2018**  
**Filed August 1, 2018**  
**File No. 001-37622**

Dear Mr. Dorsey:

We have reviewed your August 28, 2018 response to our comment letter and have the following comment. In our comment, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this comment within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comment applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to this comment, we may have additional comments. Unless we note otherwise, our references to prior comments are to comments in our August 16, 2018 letter.

Form 10-Q for the Quarter Ended June 30, 2018

Item 2. Management's Discussion and Analysis of Financial Condition and Results of Operations  
Key Operating Metrics and Non-GAAP Financial Measures  
Adjusted Revenue, page 39

1. Your adjusted revenue measure includes adjustments for transaction-based costs and bitcoin costs. Explain to us why you believe this measure does not substitute individually tailored recognition and measurement methods for those of GAAP. Refer to Question 100.04 of the Non-GAAP Financial Measures Compliance and Disclosure Interpretations.

Jack Dorsey  
Square, Inc.  
November 1, 2018  
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You may contact Laura Veator, Staff Accountant, at 202-551-3716 or Stephen Krikorian, Accounting Branch Chief, at 202-551-3488 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Information Technologies  
and Services