

Mail Stop 3561

September 4, 2008

Via Fax & U.S. Mail

Mr. George Achniotis
Chief Financial Officer
85 Akti Miaouli Street
Piraeus, Greece 185 38

**Re: Navios Maritime Holdings Inc.
Form 20-F for the year ended December 31, 2007
Filed March 31, 2008
File No. 001-33311**

Dear Mr. Achniotis:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Linda Cvrkel
Branch Chief

VIA FACSIMILE (212) 983-3115
Mr. Kenneth R. Koch, Esq.
Mintz Levin