

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

Mail Stop 3561

December 8, 2015

Mr. George Achniotis Chief Financial Officer Navios Maritime Holdings, Inc. 7 Avenue de Grande Bretagne Office 11B2 Monte Carlo, 98000 Monoco

Re: Navios Maritime Holdings, Inc.

Form 20-F for the Year Ended December 31, 2014

File April 3, 2015 File No. 001-33311

Dear Mr. Achniotis:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Melissa Raminpour

Melissa Raminpour Branch Chief Office of Transportation and Leisure