UNITED STATES SECURITIES AND EXCHANGE COMMISSION December 5, 2016

ORDER GRANTING CONFIDENTIAL TREATMENT UNDER THE SECURITIES EXCHANGE ACT OF 1934

Aerocentury Corp

File No. 1-13387 - CF#34258

Aerocentury Corp submitted an application under Rule 24b-2 requesting confidential treatment for information it excluded from the Exhibits to a Form 8-K filed September 21, 2016.

Based on representations by Aerocentury Corp 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(s) will not be released to the public for the time period(s) specified:

Exhibit 99.1 through September 20, 2026 Exhibit 99.2 through September 20, 2026

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

Brent J. Fields Secretary