

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

DIVISION OF CORPORATION FINANCE

Mail Stop 3561

November 3, 2017

Jason W. Aiken Chief Financial Officer General Dynamics Corporation 2941 Fairview Park Drive, Suite 100 Falls Church, Virginia 22042-4513

> Re: General Dynamics Corporation Form 10-K for the Fiscal Year Ended December 31, 2016 Filed February 6, 2017 File No. 001-03671

Dear Mr. Aiken:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ Melissa Raminpour

Melissa Raminpour Branch Chief Office of Transportation and Leisure