



DIVISION OF  
CORPORATION FINANCE

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

February 3, 2011

Haruyuki Urata  
Chief Financial Officer  
ORIX Corporation  
Mita NN Building  
4-1-23 Shiba  
Minato-ku  
Tokyo 108-0014  
Japan

**Re: ORIX Corporation**  
**Form 20-F for the Fiscal Year Ended March 31, 2010**  
**Filed June 29, 2010**  
**File No. 1-14856**

Dear Mr. Urata:

We have completed our review of your Form 20-F for the fiscal year ended March 31, 2010 and we have no further comments.

Sincerely,

Gregory Dundas  
Senior Counsel

cc: (by facsimile to +81-3-5561-4425)  
Christopher Kodama  
Davis Polk & Wardwell LLP