



DIVISION OF
CORPORATION FINANCE

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

November 14, 2012

Via E-mail

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, 2012
Filed June 27, 2012
File No. 001-14856

Dear Mr. Urata:

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/ Suzanne Hayes
Suzanne Hayes
Assistant Director