



DIVISION OF  
CORPORATION FINANCE

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

May 18, 2021

Peter Ingram  
President and Chief Executive Officer  
HAWAIIAN HOLDINGS INC  
3375 Koapaka Street, Suite G-350  
Honolulu, HI 96819

**Re: HAWAIIAN HOLDINGS INC**  
**Form 10-K for the Fiscal Year Ended December 31, 2020**  
**Filed on February 12, 2021**  
**Form 8-K filed on January 26, 2021**  
**File No. 001-31443**

Dear Mr. Ingram :

We have reviewed your April 8, 2021 response to our comment letter and have the following comment. In our comment, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this comment within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comment applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to this comment, we may have additional comments. Unless we note otherwise, our reference to prior comments are to comments in our March 19, 2021 letter.

Form 8-K filed on January 26, 2021

Non-GAAP Financial Reconciliation (unaudited)

1. We have read your response to comment 2. We note that you are using EBITDAR to evaluate your financial performance. Since this measure eliminates aircraft rent, which is a normal, recurring cash operating expense necessary to operate your business, it should not be presented as a measure of overall performance. However, your response appears to indicate you are also using EBITDAR as a valuation metric. As such, revise to present it solely as a valuation measure and only for the period being presented and include disclosure regarding the purpose and use of this measure as well as the limitations of its use, including that it should not be viewed as a measure of overall performance since it excludes aircraft rent.

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You may contact Robert Babula, Senior Staff Accountant at (202) 551-3339, or Gus Rodriguez, Branch Chief at (202) 551-3752 if you have questions regarding comments on the financial statements and related matters.

Sincerely,

Division of Corporation Finance  
Office of Energy & Transportation