



DIVISION OF  
CORPORATION FINANCE

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

November 8, 2018

Mark Pearson  
President and Chief Executive Officer  
AXA Equitable Holdings, Inc.  
1290 Avenue of the Americas  
New York, New York 10104

**Re: AXA Equitable Holdings, Inc.**  
**Draft Registration Statement on Form S-1**  
**Submitted November 7, 2018**  
**CIK No. 0001333986**

Dear Mr. Pearson:

This is to advise you that we do not intend to review your registration statement.

We request that you publicly file your registration statement no later than 48 hours prior to the requested effective date and time. Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Irene Paik at 202-551-6553 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Healthcare & Insurance

cc: Peter J. Loughran, Esq.