



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4720

November 8, 2017

Joan F. Berger  
General Counsel  
Pzena Investment Management, Inc.  
320 Park Avenue  
New York, NY 10022

**Re: Pzena Investment Management, Inc.  
Registration Statement on Form S-3  
Filed November 3, 2017  
File No. 333-221340**

Dear Ms. Berger:

This is to advise you that we have not reviewed and will not review your registration statement.

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.

You may contact Jessica Livingston, Staff Attorney, at 202-551-3448 with any questions.

Sincerely,

/s/ Era Anagnosti

Era Anagnosti  
Legal Branch Chief  
Office of Financial Services