



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3561

March 27, 2018

Roberto Held  
Chief Financial Officer  
Avianca Holdings S.A.  
Aquilino de la Guardia Calle No. 8,  
IGRA Building P.O., Panama City, Republic of Panama

**Re: Avianca Holdings S.A.**  
**Form 20-F for Fiscal Year Ended December 31, 2016**  
**Filed May 1, 2017**  
**File No. 001-36142**

Dear Mr. Held:

We have completed our review of your filing. 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.

Sincerely,

/s/ Melissa Raminpour for

Lyn Shenk  
Branch Chief  
Office of Transportation and Leisure