



DIVISION OF  
CORPORATION FINANCE

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

April 29, 2016

Via E-mail

James Tanaka  
Chief Securities Counsel  
American Realty Capital Hospitality Trust, Inc.  
405 Park Ave., 14<sup>th</sup> Floor  
New York, NY 10022

**Re: American Realty Capital Hospitality Trust, Inc.  
Preliminary Proxy Statement on Schedule 14A  
Filed April 18, 2016  
File No. 000-55394**

Dear Mr Tanaka:

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/ Sonia Barros

Sonia Barros  
Assistant Director  
Office of Real Estate and  
Commodities