



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 3561

December 28, 2016

A. Mark Zeffiro  
Chief Executive Officer  
Horizon Global Corporation  
2600 West Big Beaver Road  
Suite 555  
Troy, MI 48084

**Re: Horizon Global Corporation  
Registration Statement on Form S-3  
Filed December 19, 2016  
File No. 333-215178**

Dear Mr. Zeffiro:

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.

Please contact Donald E. Field at (202) 551-3680 with any questions.

Sincerely,

/s/ Laura Nicholson

Laura Nicholson  
Special Counsel  
Office of Transportation and Leisure

cc: Michael J. Solecki  
Jones Day