



DIVISION OF
CORPORATION FINANCE

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

July 23, 2020

Brajnandan Sahay
Chief Executive Officer
ASI Aviation, Inc.
11921 Freedom Drive, Suite 550
Reston, VA 20190-5667

Re: ASI Aviation, Inc.
Offering Statement on Form 1-A
Post-qualification Amendment No. 2
Filed July 17, 2020
File No. 024-10786

Dear Dr. Sahay:

We have reviewed your amendment and do not have any comments.

We will consider qualifying your offering statement at your request. If a participant in your offering is required to clear its compensation arrangements with FINRA, please have FINRA advise us that it has no objections to the compensation arrangements prior to qualification.

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 Cara Wirth at (202) 551-7127 or Erin Jaskot at (202) 551-3442 with any questions.

Sincerely,

Division of Corporation Finance
Office of Trade & Services

cc: Louis A. Bevilacqua, Esq.