



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

DIVISION OF  
CORPORATION FINANCE

July 17, 2019

Virgilio Deloy Capobianco Gibbon  
Chief Executive Officer  
Afya Limited  
Alameda Oscar Niemeyer, No 119, Sala 504  
Vila da Serra, Nova Lima, Minas Gerais, Brazil

**Re: Afya Limited**  
**Amendment No. 1 to Form F-1**  
**Exhibit Nos. 10.2, 10.3, 10.4, and 10.5**  
**Filed July 9, 2019**  
**File No. 333-232309**

Dear Mr. Gibbon:

We have concluded our assessment of your redacted exhibits for compliance with applicable form requirements and will process your supplemental response and related materials in accordance with your request.

Sincerely,

Division of Corporation Finance