



DIVISION OF
CORPORATION FINANCE

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

December 3, 2015

Mail Stop 4631

Via E-mail

Mr. Donald Fallon
Chief Financial Officer
Axion International Holdings, Inc.
4005 All American Way
Zanesville, OH 43701

RE: Axion International Holdings, Inc.
Form 10-K for the Year Ended December 31, 2014
Filed March 31, 2015
File No. 0-13111

Dear Mr. Fallon:

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/ John Cash

John Cash
Accounting Branch Chief
Office of Manufacturing and
Construction