

August 20, 2019

Angeliki Frangou  
Chairman and Chief Executive Officer  
Navios Maritime Acquisition Corporation  
Navios Maritime Partners, L.P.  
Navios Maritime Holdings, Inc.  
7 Avenue de Grande Bretagne, Office 11B2  
Monte Carlo, MC 98000 Monaco

Re: Navios Maritime Acquisition Corporation  
Form 20-F for the Fiscal Year Ended December 31, 2018  
Filed April 19, 2019 and File No. 001-34104  
Navios Maritime Partners L.P.  
Form 20-F for the Fiscal Year Ended December 31, 2018  
Filed April 9, 2019 and File No. 001-33811  
Navios Maritime Holdings Inc.  
Form 20-F for the Fiscal Year Ended December 31, 2018  
Filed April 29, 2019 and File No. 001-33311

Dear Ms. Frangou:

We have completed our review of your filings. 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.

Sincerely,

Division of

Office of

Corporation Finance

Transportation and Leisure