

October 28, 2015

Ms. Melissa Raminpour
Branch Chief
Division of Corporation Finance
United States Securities and Exchange Commission
100 F. Street, N.E.
Washington D.C. 20549

Re: **Navios Maritime Holdings Inc.**
Form 20-F for the Year Ended December 31, 2014
File No. 001-33311

Dear Ms. Raminpour:

Navios Maritime Holdings Inc. (the "Company") hereby acknowledges that:

- the Company is responsible for the adequacy and accuracy of the disclosure in its filings;
- Staff comments or changes to disclosures in response to Staff comments do not foreclose the Commission from taking any action with respect to our filings; 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.

Sincerely,

/s/ Vasiliki Papaefthymiou
Vasiliki Papaefthymiou
Executive Vice President, Legal

cc: Melissa Gilmore, Securities and Exchange Commission
George Achniotis, Navios Maritime Holdings Inc.
Stuart Gelfond, Fried, Frank, Harris, Shriver & Jacobson LLP
Mark Hayek, Fried, Frank, Harris, Shriver & Jacobson LLP