

**NAVIOS MARITIME HOLDINGS INC.**

Strathvale House, 90 N Church Street  
P.O. Box 309, Grand Cayman,  
KY1-1104 Cayman Islands

July 9, 2021

**VIA EDGAR**

Liz Packebusch  
Division of Corporation Finance  
Office of Energy & Transportation  
United States Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-3628

RE: **Navios Maritime Holdings Inc.**  
**Registration Statement on Form F-1**  
**Filed July 1, 2021**  
**File No. 333-257606**

Dear Ms. Packebusch:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, Navios Maritime Holdings Inc. hereby requests that the effective date of the above-referenced Registration Statement on Form F-1 be accelerated so that the Registration Statement may become effective at 4:00 p.m. (Eastern Time) on Tuesday, July 13, 2021, or as soon thereafter as practicable.

Please contact Mark Hayek of Fried, Frank, Harris, Shriver & Jacobson LLP at (212) 859-8890 or Mark.Hayek@friedfrank.com with any comments or questions regarding the Registration Statement, this letter or related matters.

Very truly yours,

**Navios Maritime Holdings Inc.**

By: /s/ Vasiliki Papaefthymiou  
\_\_\_\_\_  
Vasiliki Papaefthymiou  
Executive Vice President – Legal