

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
November 15, 2017**

**ORDER GRANTING CONFIDENTIAL TREATMENT  
UNDER THE SECURITIES EXCHANGE ACT OF 1934**

**Telenav, Inc.**

**File No. 1-34720 - CF#35470**

---

Telenav, Inc. submitted an application under Rule 24b-2 requesting confidential treatment for information it excluded from Exhibit 10.16.39 to a Form 10-K filed on August 25, 2017, as modified by the same contract refiled with fewer redactions as Exhibit 10.16.39 to a Form 10-Q filed on November 9, 2017.

Based on representations by Telenav, Inc. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibit(s) will not be released to the public for the time period(s) specified:

Exhibit 10.16.39 to Form 10-K filed August 25, 2017      through June 1, 2023  
Exhibit 10.16.39 to Form 10-Q filed November 9, 2017      through June 1, 2023

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Brent J. Fields  
Secretary