



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

DIVISION OF  
CORPORATION FINANCE

February 26, 2020

Adrian Neuhauser  
Chief Financial Officer  
Avianca Holdings S.A.  
Edificio P.H. ARIFA, Pisos 9 y 10, Boulevard Oeste,  
Santa María Business District, Panama City,  
Republic of Panama

**Re: Avianca Holdings S.A.**  
**Form 20-F for the Fiscal Year ended December 31, 2018**  
**Filed April 29, 2019**  
**File No. 001-36142**

Dear Mr. Neuhauser:

We have completed our review of your filing. 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 Corporation Finance  
Office of Energy & Transportation

cc: Renato Covelo