

Athene Holding Ltd.  
96 Pitts Bay Road  
Pembroke, HM08, Bermuda

December 6, 2016

**VIA EDGAR**

Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549  
Attention: Ms. Suzanne Hayes, Assistant Director

Re: Athene Holding Ltd.  
Registration Statement on Form S-1 (File No. 333-211243)  
**REQUEST FOR ACCELERATION OF EFFECTIVENESS**

Ladies and Gentlemen:

Pursuant to Rule 461 promulgated under the Securities Act of 1933, as amended, Athene Holding Ltd. (the "Company") hereby requests that its Registration Statement on Form S-1 (File No. 333-211243) (as amended, the "Registration Statement"), be declared effective at 2:00 p.m., Eastern Time, on December 8, 2016, or as soon thereafter as practicable. By separate letter the underwriters of the issuance of securities being registered have joined in this request for acceleration.

Once the Registration Statement is effective, please orally confirm the event with our counsel, Sidley Austin LLP by calling Samir A. Gandhi at (212) 839-5684. We also respectfully request that a copy of the written order from the Commission verifying the effective time and date of the Registration Statement be sent to our counsel, Samir A. Gandhi of Sidley Austin LLP, by email to [sgandhi@sidley.com](mailto:sgandhi@sidley.com).

*[Signature page follows]*

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Very truly yours,

ATHENE HOLDING LTD.

By: /s/ Martin P. Klein  
Martin P. Klein  
Chief Financial Officer

*Signature Page to Acceleration Request*