

January 4, 2022

VIA EDGAR

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549

**Re: Athene Holding Ltd.  
Request for Withdrawal of Withdrawal Request Relating to Registration  
Statements on Form S-3 (File Nos. 333-237242, 333-251884, and 333-256274)**

Ladies and Gentlemen:

Pursuant to Rule 477 of the Securities Act of 1933, as amended (the "Securities Act"), Athene Holding Ltd., an exempted company organized under the laws of Bermuda, (the "Company") hereby respectfully requests that the Securities and Exchange Commission (the "SEC") consent to the withdrawal, effective as of the date hereof or at the earliest practicable date hereto, of the Company's Withdrawal Request dated on January 3, 2022 (the "Withdrawal Request") relating to the registration statements on Form S-3 (File Nos. 333-237242, 333-251884, and 333-256274), together with all exhibits thereto (the "Prior Registration Statements"). The Company will be filing on the date hereof via EDGAR a post-effective amendment to Form S-3 ASR for each of the Prior Registration Statement to terminate the effectiveness thereof.

Please provide a copy of the order granting the withdrawal of the Withdrawal Request to the undersigned via email to Ira Rosenblatt at [irosenblatt@athene.com](mailto:irosenblatt@athene.com), with a copy to Robert Ryan of Sidley Austin LLP, the Company's outside counsel, via email [atryan@sidley.com](mailto:atryan@sidley.com).

Sincerely,

Athene Holding Ltd.

By: /s/ John Golden  
Name: John Golden  
Title: Executive Vice President and General Counsel