

July 5, 2017

**VIA EDGAR**

Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street NE  
Washington, DC 20549  
Attention: Julie Griffith

Re: Air Industries Group  
Registration Statement on Form S-1 (File No. 333-217582)

Ladies and Gentlemen:

Pursuant to Rule 461 promulgated under the Securities Act of 1933, as amended (the "Securities Act"), we hereby join in the request of Air Industries Group (the "Registrant"), for the acceleration of the effective date of the Registrant's Registration Statement on Form S-1 (File No. 333-217582) (as amended, the "Registration Statement"), relating to the public offering of shares of common stock of the Registrant, so that the Registration Statement may be declared effective on July 6, 2017 at 5:00 P.M. Eastern Time, or as soon thereafter as practicable. The undersigned, as the representative of the underwriters, confirms that we are aware of our obligations under the Securities Act.

Pursuant to Rule 460 under the Securities Act, we wish to advise you that we have distributed approximately 100 copies of the preliminary prospectus dated June 29, 2017, through the date hereof.

Very truly yours,

Roth Capital Partners, LLC

By: /s/ Aaron M. Gurewitz  
Name: Aaron M. Gurewitz  
Title: Head of Equity Capital Markets

cc: Jonathan J. Russo, Esq.  
Vincent J. McGill, Esq.

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