

DIVISION OF CORPORATION FINANCE SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

UNITED STATES

July 28, 2015

Norman Smagley Chief Financial Officer Gogo, Inc. 1250 North Arlington Heights Road Itasca, IL 60143

> Re: Gogo, Inc. Form 10-K for Fiscal Year Ended December 31, 2014 Filed February 27, 2015 File No. 1-35975

Dear Mr. Smagley:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Terry French for

Larry Spirgel Assistant Director