Michael Chan Chief Financial Officer TEXTAINER GROUP HOLDINGS LTD 16 Par-La-Ville Road Hamilton HM 08 Bermuda

Re: TEXTAINER GROUP HOLDINGS LTD

Form 20-F for the Fiscal Year Ended December 31, 2018

Filed March 25, 2019 File No: 1-33725

Dear Mr. Chan:

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

Office of

011100 01

Construction

Corporation Finance
Manufacturing and