November 7, 2019 Securities and Exchange Commission Judiciary Plaza 450 Fifth Street, N.W. Washington, D.C. 20549-0405

Attention: Melissa Gilmore

Division of Corporate Finance Office of Manufacturing

Re: Astronics Corporation

Form 10-K for the Fiscal Year Ended December 31, 2018 filed March

1, 2019

Form 8-K Furnished on August 5, 2019

Commission file no. 000-07087

Dear Ms. Gilmore:

By this letter, Astronics Corporation (the "Company" or "Astronics") is responding to the comment of the staff (the "Staff") of the Securities and Exchange Commission (the "Commission") to our Annual Report on Form 10-K for the year ended December 31, 2018 filed with the Commission on March 1, 2019 and our Current Report on Form 8-K furnished to the Commission on August 5, 2019. The comments of the Staff were set forth in a letter of comment dated October 24, 2019.

As we discussed with Ms. Adams on October 31, 2019, we would like to request an extension to the filing deadline for our response. Currently a response was requested within 10 business days, which would make the response due by November 7, 2019. We are requesting that this date be extended to November 21, 2019 so that we may continue our discussion with the Commission on an acceptable form of presentation of the non-GAAP measures in our future filings.

The Company acknowledges that: (i) it is responsible for the adequacy and accuracy of the disclosure contained in its filings with the Commission pursuant to the Securities Exchange Act of 1934, as amended (the "Filings"); (ii) Staff comments or changes to the Company's disclosure in response to Staff comments in the Filings reviewed by the Staff do not foreclose the commission from taking any action with respect to any Filings and (iii) the Company may not assert Staff comments as a defense to in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

Yours truly,

ASTRONICS CORPORATION

By: <u>/s/ David C. Burney</u>
David C. Burney
Vice President and Chief Financial Officer

cc: Julie Davis, Esq. Robert J. Olivieri, Esq.