

SOLAR CAPITAL LTD.
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May 24, 2018

U.S. Securities and Exchange Commission
Division of Investment Management
100 F Street N.E.
Washington, DC 20549
Attn: Karen Rossotto, Esq.

Re: Solar Capital Ltd.
Pre-Effective Amendment No. 1 to the Registration Statement on Form N-2
Filed on May 24, 2018 (File No. 333-223663)

Dear Ms. Rossotto:

In accordance with Rule 461 of the General Rules and Regulations under the Securities Act of 1933, as amended, Solar Capital Ltd. (the "**Company**") hereby respectfully requests acceleration of effectiveness of Pre-Effective Amendment No. 1 to the Company's registration statement on Form N-2 (File No. 333-223663), including all amendments thereto (the "**Registration Statement**"), to 12:00 p.m., Eastern Time, on May 25, 2018, or as soon as thereafter as possible.

In connection with the submission of the Company's request for accelerated effectiveness of the Registration Statement, the Company hereby acknowledges that:

- the Company is responsible for the adequacy and accuracy of the disclosure in the filing;
- should the Securities and Exchange Commission (the "**Commission**") or the staff thereof (the "**Staff**"), acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;
- the action of the Commission or the Staff, acting pursuant to delegated authority, in declaring the filing effective, does not relieve the Company from its full responsibility for the adequacy and accuracy of the disclosure in the filing; and
- the Company may not assert this action as defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

SOLAR CAPITAL LTD.

By: /s/ Richard L. Peteka
Richard L. Peteka
Chief Financial Officer, Treasurer and Secretary