UNITED STATES SECURITIES AND EXCHANGE COMMISSION July 25, 2018

ORDER GRANTING CONFIDENTIAL TREATMENT UNDER THE SECURITIES ACT OF 1933

Tenable Holdings, Inc.

File No. 333-226002 - CF#36434

Tenable Holdings, Inc. submitted an application under Rule 406 requesting confidential treatment for information it excluded from the Exhibits to a Form F-1 registration statement filed on June 29, 2018.

Based on representations by Tenable Holdings, Inc. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibit(s) will not be released to the public for the time period(s) specified:

Exhibit 10.12 through June 6, 2023

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Brent J. Fields Secretary