

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

May 14, 2025

Andrew Guggenhime President and Chief Financial Officer Vaxcyte, Inc. 825 Industrial Road, Suite 300 San Carlos, California 94070

Re: Vaxcyte, Inc.

Form 10-K for the Fiscal Year Ended December 31, 2024

Filed February 25, 2025 File No. 001-39323

Dear Andrew Guggenhime:

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 Corporation Finance Office of Life Sciences