



DIVISION OF
CORPORATION FINANCE

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

April 22, 2015

Via-Email

Matias I. Gaivironsky
Chief Financial Officer
IRSA Propiedades Comerciales S.A.
(f/k/a Alto Palermo S.A. (APSA))
Moreno 877 21st Floor
Buenos, Aires Argentina

Re: IRSA Propiedades Comerciales S.A. (f/k/a Alto Palermo S.A. (APSA))
Form 20-F
Filed on October 31, 2014
File No. 000-30982

Dear Gaivironsky:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Jennifer Monick

Jennifer Monick
Senior Staff Accountant