



DIVISION OF  
CORPORATION FINANCE

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

May 26, 2021

Anna Paglia  
Chief Executive Officer  
Invesco DB Multi-Sector Commodity Trust  
Invesco DB Base Metals Fund  
3500 Lacey Road, Suite 700  
Downers Grove, Illinois 60515

**Re: Invesco DB Multi-Sector Commodity Trust**  
**Invesco DB Base Metals Fund**  
**Registration Statement on Form S-3**  
**Filed May 21, 2021**  
**File No. 333-256371**

Dear Ms. Paglia:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Julia Griffith at 202-551-3267 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Finance