



DIVISION OF  
CORPORATION FINANCE

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

June 28, 2021

Anna Paglia  
Chief Executive Officer  
Invesco Capital Management LLC  
3500 Lacey Road, Suite 700  
Downers Grove, IL 60515

**Re: Invesco DB Multi-Sector Commodity Trust**  
**Registration Statement on Form S-3**  
**Filed June 22, 2021**  
**File No. 333-257270**

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 David Lin, Staff Attorney, at (202) 551-3552 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Finance