

December 15, 2020

U.S. Securities and Exchange Commission Division of Investment Management 100 F Street, NE Washington, D.C. 20549

RE: ProShares Trust II Issuer CIK: 0001415311 Issuer File Number: 333-244420/001-34200 Form Type: 8-A12B Filing Date: December 15, 2020

To Whom It May Concern:

Please be advised that Cboe BZX Exchange, Inc. has received an application from the abovereferenced issuer and has approved the following securities for listing on Cboe BZX Exchange, Inc. ("Exchange"):

- ProShares VIX Short-Term Futures ETF (VIXY)
- ProShares VIX Mid-Term Futures ETF (VIXM)
- ProShares Ultra VIX Short-Term Futures ETF (UVXY)
- ProShares Short VIX Short-Term Futures ETF (SVXY)

The Exchange requests acceleration of registration of these securities under the Securities Exchange Act of 1934, as amended. If there are any questions, please call me at (913) 815-7024. Your assistance is greatly appreciated.

Sincerely,

Bianna Stadden

Bianca Stodden Initial Listings Analyst