



DIVISION OF  
CORPORATION FINANCE

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

November 22, 2019

Christopher Demetriou  
President and Chief Executive Officer  
c/o Aberdeen Standard Investments ETFs Sponsor LLC  
712 Fifth Avenue, 49th Floor  
New York, NY 10019

**Re: Aberdeen Standard Precious Metals Basket ETF Trust**  
**Registration Statement on Form S-3**  
**Filed November 15, 2019**  
**File No. 333-234723**

Dear Mr. Demetriou:

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 Gessert at 202-551-2326 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Finance