



July 17, 2019

Chief, Information Technology Securities and Exchange Commission Division of Corporate Finance 100 F Street, NE MS 3040 Washington, DC 20549

To whom it may concern:

Bes Layr

The NYSE Arca certifies its approval for listing and registration of the WBI BullBear Trend Switch US Total Return ETF of Absolute Shares Trust under the Exchange Act of 1934.

Sincerely,