



December 17, 2024

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

RE: Pacer Funds Trust  
Issuer CIK: 0001616668  
Issuer File Number: 333-201530 / 811-23024  
Form Type: 8-A12B  
Filing Date: December 17, 2024

To Whom It May Concern:

Cboe BZX Exchange, Inc. certifies its approval for listing and registration of Pacer Solactive Whitney Future of Warfare ETF and Pacer US Cash Cows Bond ETF under the Exchange Act of 1934.

Sincerely,

A handwritten signature in black ink, appearing to be 'Charles Sullivan', with a long horizontal line extending to the right.

Charles Sullivan  
Senior Analyst, Listing Qualifications