



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

DIVISION OF  
CORPORATION FINANCE

February 5, 2021

Richard P. Sandulli  
Co-Chief Executive Officer  
Metaurus Equity Component Trust  
22 Hudson Place  
Third Floor  
Hoboken, NJ 07030

**Re: Metaurus Equity Component Trust  
Registration Statement on Form S-1  
Filed January 29, 2021  
File No. 333-252549**

Dear Mr. Sandulli:

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 Sonia Bednarowski at 202-551-3666 or Justin Dobbie, Legal Branch Chief, at 202-551-3469 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Finance