



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

DIVISION OF
CORPORATION FINANCE

Mail Stop 3628

November 6, 2019

Helaine M. Kaplan
President
Deutsche Mortgage & Asset Receiving Corporation
c/o Wells Fargo Bank, National Association as Certificate Administrator
9062 Old Annapolis Road
Columbia, MD 20145

Re: CD 2018-CD7 Mortgage Trust
Form 10-K for Fiscal Year Ended December 31, 2018
Filed March 20, 2019
File No. 333-206705-15

Dear Ms. Kaplan:

We have completed our review of your filing. 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.

Sincerely,

/s/ Arthur C. Sandel

Arthur C. Sandel
Special Counsel
Office of Structured Finance

cc: Anna Glick, Cadwalader, Wickersham & Taft LLP
Kate Foreman, Cadwalader, Wickersham & Taft LLP