



DIVISION OF
CORPORATION FINANCE

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

August 17, 2020

Jane Lam
Director and President
Morgan Stanley Capital I Inc.
1585 Broadway
New York, NY 10036

**Re: BANK 2019-BNK20
Form 10-K
Filed March 30, 2020
File No. 333-227446-06**

Dear Ms. Lam:

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/ Katherine Hsu

Katherine Hsu
Office Chief
Office of Structured Finance