



DIVISION OF  
CORPORATION FINANCE

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

June 8, 2020

René Lacerte  
Chief Executive Officer  
Bill.com Holdings, Inc.  
1810 Embarcadero Road  
Palo Alto, CA 94303

**Re: Bill.com Holdings, Inc.**  
**Draft Registration Statement on Form S-1**  
**Submitted June 5, 2020**  
**CIK No. 0001786352**

Dear Mr. Lacerte:

This is to advise you that we do not intend to review your registration statement.

We request that you publicly file your registration statement no later than 48 hours prior to the requested effective date and time. Please refer to Rule 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 Jeff Kauten, Attorney-Advisor, at (202) 551-3447, or in his absence, Jan Woo, Legal Branch Chief, at (202) 551-3453, with any questions. If you require further assistance, please contact Larry Spigel, Office Chief, at (202) 551-3815.

Sincerely,

Division of Corporation Finance  
Office of Technology

cc: James Evans, Esq.