



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

DIVISION OF  
CORPORATION FINANCE

October 29, 2020

Ray Young  
Chief Financial Officer  
Archer-Daniels-Midland Co  
77 West Wacker Drive, Suite 4600  
Chicago, IL 60601

**Re: Archer-Daniels-Midland Co**  
**Form 10-K for the year ended December 31, 2019**  
**Filed on February 18, 2020**  
**Form 10-Q for the quarter ended March 31, 2020**  
**Filed on May 1, 2020**  
**File No. 1-00044**

Dear Mr. Young:

We have completed our review of your filings. 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,

Division of Corporation Finance  
Office of Manufacturing