



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

DIVISION OF  
CORPORATION FINANCE  
MAIL STOP: 3561

August 14, 2017

Via E-Mail

Luke H. Paladino  
Trust Division  
U.S. Bank National Association  
1700 Farnam Street  
Omaha, Nebraska 68102

**Re: Kiewit Royalty Trust**  
**Form 10-K for the Fiscal Year Ended December 31, 2016**  
**Filed March 30, 2017**  
**File No. 000-10810**

Dear Mr. Paladino:

We have limited our review of your filing to the financial statements and related disclosures and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to these comments within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comments apply to your facts and circumstances, please tell us why in your response.

After reviewing your response to these comments, we may have additional comments.

1. We note your discussion of "coal tons under lease" and "current economic tons". Please quantify and disclose these tonnage amounts for each lease in your filing and disclose your coal reserves for each mine, disclosing whether the coal is steam or metallurgical coal, the recoverable tonnage, Btu, and sulfur content. In addition please disclose the average mining and wash plant recoveries.

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.

Luke H. Paladino  
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Please contact George K. Schuler, Mining Engineer at (202) 551-3718 or me at (202) 551-3795 with any questions.

Sincerely,

/s/ John Reynolds

John Reynolds  
Assistant Director  
Office of Beverages, Apparel and Mining