

Mail Stop 4561

January 10, 2007

VIA USMAIL and FAX (303) 708-5999

Mr. Charles E. Mueller, Jr.  
Chief Financial Officer  
Archstone-Smith Operating Trust  
9200 E. Panorama Circle, Suite 400  
Englewood, Colorado 80112

**Re: Archstone-Smith Operating Trust**  
**Form 10-K for the year ended 12/31/2005**  
**Filed on 3/9/2006**  
**File No. 001-10272**

Dear Mr. Charles E. Mueller, Jr.:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Jorge Bonilla  
Senior Staff Accountant