



DIVISION OF
CORPORATION FINANCE

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

December 14, 2012

Via e-mail

Mr. Gregory R. Andrews
Chief Financial Officer
Ramco-Gershenson Properties Trust
31500 Northwestern Highway, Suite 300
Farmington Hills, MI 48334

**RE: Ramco-Gershenson Properties Trust
Form 10-K for the Fiscal Year Ended December 31, 2011
Filed March 8, 2012
File No. 1-10093**

Dear Mr. Andrews:

We have reviewed your response letter dated December 13, 2012, and have the following additional comment. In our comment, we ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter via EDGAR within ten business days by providing the requested information or by advising us when you will provide the requested response.

After reviewing any amendment to your filings and the information you provide in response to this comment, we may have additional comments.

Item 7. Management's Discussion and Analysis of Financial Condition..., page 23

Funds from Operations, page 38

1. We have reviewed your revised intended disclosure. We note that you consider "FFO, excluding items above" a meaningful, additional measure of financial performance because it excludes periodic non-cash items. Please tell us how you determined that this non-GAAP measure is a performance measure as opposed to a liquidity measure.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable Exchange Act rules require. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

Mr. Gregory R. Andrews
Ramco-Gershenson Properties Trust
December 14, 2012
Page 2

You may contact William Demarest, Staff Accountant, at (202) 551-3432 or me at (202) 551-3694 with any questions.

Sincerely,

/s/ Jonathan Wiggins

Jonathan Wiggins
Staff Accountant