



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3233

September 12, 2018

Via E-mail

Mr. Alexander J. Jessett  
Chief Financial Officer  
Camden Property Trust  
11 Greenway Plaza, Suite 2400  
Houston, TX 77046

**Re: Camden Property Trust  
Form 10-K for the Fiscal Year Ended December 31, 2017  
Filed February 16, 2018  
Form 8-K filed August 2, 2018  
File No. 1-12110**

Dear Mr. Jessett:

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.

Form 10-K for the year ended December 31, 2017

Financial Statements

Notes to Consolidated Financial Statements

2. Summary of Significant Accounting Policies and Recent Accounting Pronouncements

Income Recognition, page F-12

1. We note your disclosure that your rental revenue is recorded when due from residents and is recognized monthly as it is earned. To the extent you have non-level rents, please tell

us and revise future filings to clarify if you record rental revenue on a straight-line basis.  
Please refer to ASC 840-20-25.

Form 8-K filed August 2, 2018

Exhibit 99.1

2. We note your presentation of FFO per share and AFFO per share for the three and six months ended June 30, 2018 and 2017. In future earnings releases, please reconcile these non-GAAP per share measures to GAAP earnings per share. Please refer to Question 102.05 of the updated Compliance and Disclosure Interpretations issued on May 17, 2016.

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.

You may contact William Demarest, Accountant at 202-551-3432 or me at 202-551-3295 with any questions.

Sincerely,

/s/ Jennifer Monick

Jennifer Monick  
Assistant Chief Accountant  
Office of Real Estate  
& Commodities