



DIVISION OF
CORPORATION FINANCE

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

September 14, 2011

VIA E-Mail

Ms. Virginia M. Wilson
Executive Vice President and Chief Financial Officer
TIAA Real Estate Account
730 Third Avenue
New York, New York 10017-3206

Re: TIAA Real Estate Account
Form 10-K for the year ended December 31, 2010
Filed on March 17, 2011
Form 10-Q for the Quarter Ended June 30, 2011
Filed August 11, 2011
File No. 033-92990

Dear Ms. Virginia M. Wilson:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Daniel L. Gordon

Daniel L. Gordon
Branch Chief