



DIVISION OF
CORPORATION FINANCE

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

March 22, 2019

Roger W. Ferguson, Jr.
President and Chief Executive Officer
TIAA REAL ESTATE ACCOUNT
c/o Teachers Insurance and Annuity Association of America
730 Third Avenue
New York, New York 10017-3206

Re: TIAA REAL ESTATE ACCOUNT
Registration Statement on Form S-1
Filed March 15, 2019
File No. 333-230322

Dear Mr. Ferguson:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Sara von Althann at 202-551-3207 with any questions.

Sincerely,

Division of Corporation Finance
Office of Real Estate and
Commodities