



DIVISION OF
CORPORATION FINANCE

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

March 18, 2020

F. Scott Thomas, Esquire
Associate General Counsel
TIAA Real Estate Account
8500 Andrew Carnegie Blvd.
Charlotte, North Carolina 28262

Re: TIAA Real Estate Account
Registration Statement on Form S-1
Filed March 12, 2020
File No. 333-237134

Dear Mr. Thomas:

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 Ronald (Ron) Alper at 202-551-3329 with any questions.

Sincerely,

Division of Corporation Finance
Office of Real Estate & Construction

cc: Stephen Leitzell