February 14, 2023

VIA ELECTRONIC DELIVERY

Ms. Vanessa A. Countryman Secretary U.S. Securities and Exchange Commission 100 F Street, N.E. Washington, D.C. 20549

Re: Investment Company Act Release No. 34746 (File No. S7-26-22); Open-End Fund Liquidity Risk Management Programs and Swing Pricing; Form N-PORT Reporting

Dear Ms. Countryman,

We are the Independent Trustees of William Blair Funds. The William Blair Funds complex includes 19 open-end mutual funds with \$10.3 billion in total assets under management as of December 31, 2022.

Vedder Price P.C. is counsel to the Independent Trustees of the William Blair Funds. We have reviewed and fully support the positions described in the comment letter submitted by Vedder Price P.C. and we appreciate your attention to the aforementioned letter. We have also reviewed and fully support the positions described in the comment letter submitted by the Independent Directors Council.

Very truly yours,

/s/ Kathleen T. Barr

Kathleen T. Barr, Lead Independent Trustee, William Blair Funds

On behalf of:

Vann A. Avedisian Daniel N. Leib Dorri C. McWhorter Thomas J. Skelly Steven R. Zenz

 cc: The Honorable Gary Gensler, Chair, U.S. Securities and Exchange Commission The Honorable Hester M. Peirce, Commissioner, U.S. Securities and Exchange Commission The Honorable Caroline A. Crenshaw, Commissioner, U.S. Securities and Exchange Commission The Honorable Mark T. Uyeda, Commissioner, U.S. Securities and Exchange Commission The Honorable Jaime Lizárraga, Commissioner, U.S. Securities and Exchange Commission

Mr. William A. Birdthistle, Director, Division of Investment Management, U.S. Securities and Exchange Commission