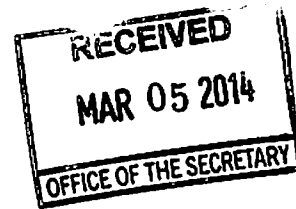


DIVIDEND CAPITAL
DIVERSIFIED PROPERTY FUND



February 28, 2014

Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090


RE: File No. SR-FINRA-2014-006, Proposed Rule Change Relating to Per Share Estimated Valuations for Unlisted DPPs and REITs

Dear Ms. Murphy:

Dividend Capital Diversified Property Fund Inc. ("DPF") converted to a daily NAV REIT on July 12, 2012, and owns approximately \$2.5 billion in assets. Since converting to a daily NAV REIT, we have conducted an ongoing offering of three different classes of our common stock, with daily NAV-based pricing. We believe that our model provides per share estimated valuations consistent with the intent of FINRA's proposed rule changes (File No. SR-FINRA-2014-006) (the "Proposed Rule") for unlisted real estate DPPs and REITs. As applied to daily NAV REITs, we support the Proposed Rule.

We particularly support, as drafted, Proposed Rule 2310(b)(5)(A) as applied to public offerings of daily NAV REITs and agree with FINRA that Proposed Rule 2310(b)(5)(B) does not apply to public offerings of daily NAV REITs, since daily NAV REITs currently perform issuer-generated valuations with material assistance from a third-party expert or experts, all as disclosed in the prospectus. We believe, as does the Proposed Rule, that our issuer-generated daily NAV based on rolling third-party appraisals provides the transparency sought by the Proposed Rule. We also believe that, although the IPA issued Practice Guideline 2013-01, entitled "Valuations of Publicly Registered Non-Listed REITs," is very helpful, this valuation guideline is not the dispositive standard for daily NAV REITs which perform issuer-generated valuations with material assistance from third-party expert or experts.

Sincerely,


 Jeff Johnson
 Chief Executive Officer