



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

DIVISION OF
CORPORATION FINANCE

Mail Stop 3233

May 2, 2017

Via E-mail

Sarah Tosdevin
Associate Director
ETFS Palladium Trust
405 Lexington Avenue
New York, NY 10174

**Re: ETFS Palladium Trust
Registration Statement on Form S-3
Filed April 26, 2017
File No. 333-217470**

Dear Ms. Tosdevin:

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 Rahul K. Patel, Staff Attorney, at (202) 551-3799 with any questions.

Sincerely,

/s/ Coy Garrison

Coy Garrison
Special Counsel
Office of Real Estate and
Commodities

cc: W. Thomas Conner