

CIM Commercial Trust Corporation
17950 Preston Road, Suite 600
Dallas, TX 75252

November 13, 2017

Via Edgar

U.S. Securities and Exchange Commission,
100 F Street, NE,
Washington, D.C. 20549.

Re: CIM Commercial Trust Corporation
Registration Statement on Form S-11 (Reg. No. 333-218019)

Ladies and Gentlemen:

Pursuant to Rule 461 promulgated under the Securities Act of 1933, as amended, CIM Commercial Trust Corporation (“CMCT”) respectfully requests that the U.S. Securities and Exchange Commission (the “Commission”) declare the above-referenced registration statement on Form S-11 (the “Registration Statement”) effective on November 16, 2017, at 9:15 a.m. Eastern Time, or as soon thereafter as practicable

CMCT acknowledges that:

- Should the Commission or the staff of the Commission, acting pursuant to delegated authority, declare the Registration Statement effective, it does not foreclose the Commission from taking action with respect to the Registration Statement.
- The action of the Commission or the staff of the Commission, acting pursuant to delegated authority, in declaring the Registration Statement effective, does not relieve CMCT from its full responsibility for the adequacy and accuracy of the disclosure in the Registration Statement.
- CMCT may not assert staff comments and the declaration of effectiveness as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

CMCT understands that the Commission will consider this request as confirmation by CMCT of its awareness of its responsibilities under the federal securities laws as they relate to the proposed public offering of the securities covered by the Registration Statement.

CMCT requests that the Commission notify us of the effectiveness of the Registration Statement by calling our counsel, Patrick S. Brown of Sullivan & Cromwell LLP, at (310) 712-6603.

Sincerely,

/s/ David Thompson
David Thompson
Chief Financial Officer

cc: Joshua Lobert
(Securities and Exchange Commission)

Patrick S. Brown
(Sullivan & Cromwell LLP)