

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

DIVISION OF CORPORATION FINANCE

February 4, 2020

Brad J. Powers, Esq. General Counsel NewLink Genetics Corporation 2503 South Loop Drive Ames, IA 50010

> Re: NewLink Genetics Corporation Preliminary Proxy Statement on Schedule 14A Filed November 20, 2019 File No. 001-35342

Dear Mr. Powers:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance Office of Life Sciences

cc: James C.T. Linfield, Esq.