



DIVISION OF
CORPORATION FINANCE

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

November 8, 2011

Via Email

Joshua J. Widoff, Esq.
Executive Vice President, Secretary and General Counsel
Dividend Capital Total Realty Trust Inc.
518 Seventeenth Street, 17th Floor
Denver, Colorado 80202

**Re: Dividend Capital Total Realty Trust Inc.
Amendment No. 1 to Schedule TO
Filed November 3, 2011
File No.:5-85609**

Dear Mr. Widoff:

We have reviewed the above referenced filing and have the following comment.

General

1. We note your response to prior comment 1 and the revised disclosure. Please confirm supplementally that any purchases the filing person makes pursuant to its redemption program after the expiration of the offer will be made in compliance with Exchange Act Rule 13e-4(f)(6).

* * *

Please electronically submit a cover letter that keys your response to our comment.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings reviewed by the staff to be certain that they have provided all material information to investors. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

Mr. Joshua Widoff
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Please direct any questions to me at (202) 551-3757. You may also contact me via facsimile at (202) 772-9203. Please send all correspondence to us at the following ZIP code: 20549-3628.

Sincerely,

/s/ Mellissa Campbell Duru

Mellissa Campbell Duru
Special Counsel
Office of Mergers & Acquisitions