

DIVISION OF CORPORATION FINANCE

June 28, 2021

Anna Paglia Chief Executive Officer Invesco DB US Dollar Index Trust 3500 Lacey Road, Suite 700 Downers Grove, Illinois 60515

> Re: Invesco DB US Dollar Index Trust Invesco DB US Dollar Index Bearish Fund Registration Statement on Form S-3 Filed June 22, 2021 File No. 333-257257

Dear Ms. Paglia:

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 Jessica Livingston at 202-551-3448 with any questions.

Sincerely,

Division of Corporation Finance Office of Finance