

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

March 16, 2021

John P. Love Chief Executive Officer United States Commodity Index Funds Trust 1850 Mt. Diablo Boulevard, Suite 640 Walnut Creek, CA 94596

> Re: United States Commodity Index Funds Trust Registration Statement on Form S-3 Filed March 9, 2021 File No. 333-254046

Dear Mr. Love:

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 Sonia Bednarowski at 202-551-3666 or Justin Dobbie, Legal Branch Chief, at 202-551-3469 with any questions.

Sincerely,

Division of Corporation Finance Office of Finance