

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

DIVISION OF CORPORATION FINANCE

July 8, 2024

Matthew Hinkle Chief Financial Officer of Sponsor Franklin Templeton Holdings Trust c/o Franklin Holdings, LLC One Franklin Parkway San Mateo, CA 94403-1906

Re: Franklin Templeton Holdings Trust Form 10-K for the Fiscal Year Ended March 31, 2023 File No. 001-41435

Dear Matthew Hinkle:

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 Crypto Assets