BofA Securities, Inc. One Bryant Park New York, New York 10036

Jefferies LLC 520 Madison Avenue New York, New York 10022

Evercore Group L.L.C. 55 East 52nd Street New York, New York 10055

June 9, 2020

## **VIA EDGAR**

Securities and Exchange Commission Division of Corporation Finance 100 F Street, N.E. Washington, D.C. 20549

Attention: Ada D. Sarmento

Mary Beth Breslin Michael Fay Al Pavot

Re: Vaxcyte, Inc.

**Registration Statement on Form S-1** 

File No. 333-238630

**Acceleration Request** 

Requested Date: Thursday, June 11, 2020 Requested Time: 4:00 P.M. Eastern Time

Ladies and Gentlemen:

In accordance with Rule 461 under the Securities Act of 1933, as amended (the "Act"), we, as representatives of the several underwriters, hereby join in the request of Vaxcyte, Inc. (the "Company") for acceleration of the effective date of the above-referenced Registration Statement, requesting effectiveness as of 4:00 P.M., Eastern Time, on June 11, 2020, or at such later time as the Company or its outside counsel, Cooley LLP, may request via telephone call to the staff of the Division of Corporation Finance of the Securities and Exchange Commission.

Pursuant to Rule 460 under the Act, we, as representatives of the several underwriters, wish to advise you that there will be distributed to each underwriter or dealer, who is reasonably anticipated to participate in the distribution of the securities, as many copies of the proposed form of preliminary prospectus as appears to be reasonable to secure adequate distribution of the preliminary prospectus.

We, the undersigned, as representatives of the several underwriters, have complied and will comply, and we have been informed by the participating underwriters that they have complied and will comply, with the requirements of Rule 15c2-8 under the Securities Exchange Act of 1934, as amended.

[Signature Page Follows]

Very truly yours,

BOFA SECURITIES, INC.

By: /s/ Michael Liloia

Authorized Signatory

JEFFERIES LLC

By: /s/ Michael Brinkman

Authorized Signatory

EVERCORE GROUP L.L.C.

By: /s/ Gloria Tang

Authorized Signatory

[Signature Page to Underwriters' Acceleration Request]