

June 24, 2019

**VIA EDGAR**

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

Attention: Sharon Blume  
Justin Dobbie  
Andi Carpenter  
Julie Griffith

**Re: Adaptive Biotechnologies Corporation  
Registration Statement on Form S-1  
File No. 333-231838**

**Acceleration Request**

**Requested Date: Wednesday, June 26, 2019  
Requested Time: 4:00 p.m., Eastern Daylight Time**

Ladies and Gentlemen:

Pursuant to Rule 460 under the Securities Act of 1933, as amended (the “**Securities Act**”), we, the representatives of the underwriters (the “**Representatives**”), wish to advise you that between June 17, 2019 and June 23, 2019 at 5:00 p.m., Eastern Daylight Time, approximately 3,135 copies of the Preliminary Prospectus of Adaptive Biotechnologies Corporation, a Washington corporation (the “**Registrant**”), dated June 17, 2019, were distributed to prospective underwriters/dealers, institutional and other investors and others.

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

In accordance with Rule 461 of the Securities Act, we hereby join in the request of the Registrant that the effectiveness of the above-captioned Registration Statement, as amended, be accelerated to 4:00 p.m. Eastern Daylight Time on June 26, 2019, or as soon thereafter as practicable. We, the undersigned Representatives, confirm that the underwriters are aware of their obligations under the Securities Act.

*[Signature Page Follows]*

Very truly yours,

GOLDMAN SACHS & CO. LLC  
J.P. MORGAN SECURITIES LLC  
BOFA SECURITIES, INC.

As representatives of the several underwriters listed in  
Schedule I to the Underwriting Agreement

GOLDMAN SACHS & CO. LLC

By: /s/ Elizabeth Wood  
Name: Elizabeth Wood  
Title: Managing Director

J.P. MORGAN SECURITIES LLC

By: /s/ Benjamin Burdett  
Name: Benjamin Burdett  
Title: Managing Director

BOFA SECURITIES, INC.

By: /s/ Adam Chazan  
Name: Adam Chazan  
Title: Managing Director

cc:

Chad Robins, Chief Executive Officer  
Chad Cohen, Chief Financial Officer  
Stacy Taylor, General Counsel  
**Adaptive Biotechnologies Corporation**

James Evans, Esq.  
Robert Freedman, Esq.  
Amanda Rose, Esq.  
**Fenwick & West LLP**

Andrew Ledbetter, Esq.  
Tyler Hollenbeck, Esq.  
Kevin Criddle, Esq.  
**DLA Piper LLP (US)**